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PRELIMINARY STATEMENT

Plaintiff NML Capital, Ltd. ("NML") holds judgments against the Republic of Argentina ("Argentina") totaling more than \$1.7 billion. To avoid its payment obligations, Argentina has engaged in elaborate mechanisms to shield its assets from creditors. *EM Ltd. v. Republic of Argentina*, 720 F. Supp. 2d 273, 279-80 (S.D.N.Y. 2010), *vacated on other grounds*, 652 F.3d 172 (2d Cir. 2011). Argentina's bad faith towards its creditors and disrespect for the authority of the United States courts has left NML with little choice but to track Argentina's assets around the world and attempt to execute on them as local laws permit. *Id*.

To be sure, many of NML's post-judgment enforcement and discovery efforts have not been run-of-the-mill. But that is purely the consequence of Argentina's extraneous behavior. Recognizing this fact, the federal district judge in Manhattan who has presided over Argentina's debt default litigation for the last 12 years has endorsed NML's broad and sometimes unconventional discovery initiatives as fully consistent with Federal Rule of Civil Procedure 69(a)(2) in which governs post-judgment discovery. In the words of that Court, "plaintiffs in these actions should be allowed some liberality in exploring means of enforcing their judgments ... [a]nd I do not intend to take a narrow view when it comes to dealing with attempts to enforce the judgments." The information sought through the Subpoena easily meets that standard. Val de Loire's motion should thus be denied, and it should be compelled to comply fully with the Subpoena.

In this matter, NML served the Subpoena on Val de Loire, a Nevada LLC, by service upon Val de Loire's registered agent, M.F. Corporate Services (Nevada) Limited ("MF Nevada").² As explained in the "Background Information" in Attachment A of the Subpoena, NML targeted Val de Loire due to its connections to two Argentine nationals—Cristobal López ("López") and Lázaro Baéz ("Baéz")—who are confidantes of Argentine President Cristina Fernández de Kirchner and her late husband Néstor Kirchner.

Transcript of *EM Ltd. & NML Capital Ltd. v. Republic of Argentina*, Feb. 2, 2007 (a copy of which his attached as Exhibit A).

Subpoena to Val de Loire LLC, Aug. 27, 2014 (a copy of which is attached as Exhibit B).

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NML has reason to believe that both López and Baéz may have misappropriated and embezzled tens of millions (if not more) of Argentine state funds in part, through shell companies like Val de Loire. López and Baéz have both been the subject of multiple criminal and journalistic investigations within Argentina examining indications that they unlawfully exploited their close relationship with the Kirchners, the President and former President of Argentina, to enrich themselves. If convicted, any funds traceable to such behavior could become the property of Argentina and therefore potentially available to satisfy NML's judgments against Argentina.

Val de Loire is a shell corporation established under Nevada law that is affiliated with López and his gaming interests—interests that he owes the Kirchner regime. Val de Loire and López appear to be linked to both Baéz and to an array of shell companies established for Baéz's benefit—123 of which are Nevada companies that have already been the subject of discovery (the "Baéz Entities"). In discovery proceedings earlier this year, this Court held that NML had valid grounds for subpoenaing the Baéz Entities due to the suggestion of those entities' ties to the alleged embezzlement scheme. NML Capital Ltd. v. Republic of Argentina, No. 2:14-cv-492-RFB-VCF, 2014 WL 3898021, at *4-8 (D. Nev. Aug. 11, 2014) ("NML Capital").

Having learned of Val de Loire's connections to López, Baéz, the Kirchners, their associates, and the Baéz entities, NML subpoenaed Val de Loire for documents concerning those entities. The Subpoena does not, as Val de Loire suggests, seek every Val de Loire document that relates to "every individual or entity whose name pops up on a Google search for 'Argentina' and 'Kirchner.'" Mot. at 7. Instead, the Subpoena asks for information relating to just 18 individuals (López, Baéz, the Kirchners, and a handful of their family members and business associates) and 6 companies (all connected to López or Baéz). See Ex. B at 14-15. For those persons and entities, the Subpoena seeks discrete types of information—principally information about funds transfers, business operations, and assets. *Id.* at 10-11.

Val de Loire's Motion grossly mischaracterizes both the law and the facts. Val de Loire fails to even to *mention*—much less distinguish—Magistrate Judge Ferenbach's Order or the numerous cases on which Magistrate Judge Ferenbach rightly relied in determining that NML was entitled to discovery from third-party shell companies in very similar circumstances. Instead,

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Val de Loire rehashes the same erroneous arguments this Court has already rejected. Val de Loire relies upon a single case—a two-page California magistrate judge discovery order—that arose in the context of discovery from a third-party concerning the assets and activities a sovereign instrumentality. Val de Loire misconstrues that order and suggests that it held that Rule 69 imposes a stringent standard for discovery sought from third-parties (which is not the law), when in fact the California magistrate judge denied the requested discovery only to the extent NML sought information about the assets of presumptively separate instrumentalities of Argentina without first showing that those instrumentalities were alter egos of Argentina. What Val de Loire leaves out is that the same Court interpreting the same subpoena ruled that NML is entitled to broad discovery of potential assets of Argentina itself—and that order was subsequently affirmed by the District Court Judge Jeffrey S. White.³ The order Val de Loire misleadingly cites is inapposite to the Subpoena at issue here, in which NML seeks to trace the fruits of criminal activity that, if such activity results in a conviction, would revert directly to Argentina—not any Argentine instrumentality.

Val de Loire also mischaracterizes the facts. Val de Loire protests that NML has not established a direct relationship between it and the judgment debtor Argentina, but it largely ignores NML's fundamental contention: that it is investigating the assets, transactions, and structure of Val de Loire and its connections to López, Baéz, and other shell companies established to facilitate the potential misappropriation and embezzlement of Argentine state funds.

Val de Loire accuses NML of engaging in a "grand fishing expedition," but the law is clear that while "Rule 69 discovery can indeed resemble the proverbial fishing expedition, . . . a judgment creditor is *entitled* to fish for assets of the judgment debtor." Ryan Inv. Corp. v. Pedregal de Cabo San Lucas, No. C. 06-3219 JW (RS), 2009 WL 5114077, at *4 (N.D. Cal. Dec. 18, 2009) (internal quotation and omitted) (emphasis retained). No doubt Val de Loire (and the

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Order NML Capital Ltd. v. Republic of Argentina, No. C 12-80185 JSW (MEJ) (Dkt. 9) (a copy of which is attached as Exhibit C); Order, NML Capital Ltd. v. Republic of Argentina, No. C 12-80185 JSW (MEJ) (Dkt. 24) (a copy of which is attached as Exhibit D).

people behind it) have their own reasons for wishing that NML not fish through its structure, assets, and transactions related to the alleged embezzlement network. But the desire to keep secrets does not immunize Val de Loire from the broad, permissive post-judgment discovery allowed under Rule 69. If Val de Loire has no documents that relate to any such embezzlement, then complying with the Subpoena will do it no harm. Indeed, even though compliance with the Subpoena would not be unduly burdensome for Val de Loire, NML is willing to resolve any conceivable burden by paying Val de Loire's reasonable costs of producing responsive documents.

NML has no interest in wasting its time or resources with discovery aimed at persons or entities with no suspected connection to Argentina or its assets. NML only pursues discovery when, as here, it has a reasonable belief that the information sought may assist in its post-judgment discovery efforts. The information sought through the Subpoena easily meets that standard. Val de Loire's motion should thus be denied, and it should be compelled to comply fully with the Subpoena.

STATEMENT OF FACTS AND PROCEDURAL HISTORY

I. <u>The Alleged Embezzlement Scheme</u>.

Val de Loire is part of a web of shell companies associated with a suspected scheme to embezzle misappropriated Argentine state assets. Val de Loire's ties to Cristobal López, Lázaro Baéz, and the Baéz Entities all suggest Val de Loire's involvement in the scheme and indicate that Val de Loire may possess information that could help NML further develop its understanding of where the funds in question are currently located.

A. <u>Cristobal López</u>

Cristobal López is an Argentine national who has amassed a controversial fortune in the gambling and hydrocarbon industries, among others, during the Presidencies of Néstor and Cristina Kirchner. López has been the subject of multiple criminal and journalistic investigations within Argentina since Néstor Kirchner became President of Argentina in 2003. Virtually all of these investigations involve allegations that he improperly benefitted from his relationship with

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former Argentine President Néstor Kirchner to enrich himself at the expense of the Argentine state. The accusations center on López's improper and potentially illegal acquisition of lucrative hydrocarbon and gambling concessions.⁵ López appears to hold many of his assets through his Nevada shell corporation, Centenary International Corp. 6

More recently, Argentine Judge Rodolfo Canicoba Corrál opened a formal investigation into two of López's casino operations for defrauding the government, colluding with public officials to violate the requirements of their positions, and tax evasion. Judge Canicoba Corrál assigned prosecutor Guillermo Marijuan, who also worked with Argentine prosecutor José María Campagnoli on an intensive investigation into alleged misappropriation of state funds and embezzlement activity by Lázaro Baéz.8

В. Lázaro Baéz

In the NML Capital proceedings before this Court, NML has already shown the connections between Lázaro Baéz, the 123 Nevada shell companies (i.e., the Baéz Entities), and the widely reported embezzlement of Argentine assets. See generally NML Capital, 2014 WL 3898012, at *1-2. As summarized in NML Capital:

[I]n April 2013, the Argentine government initiated an investigation, dubbed La Ruta Del Dinero K (i.e., "the K Money Trail"), into Argentina's former president, Néstor Kirchner, his wife, current Argentine President Cristina Fernández de Kirchner, their confident Lázaro Baéz, and the trios' sordid financial affairs. All

See Criminal Complaint against Nestor Kirchner (a translated copy of which is attached as Exhibit E); Amended Criminal Complaint with Proposal of Evidence (a translated copy of which is attached as Exhibit F); Amended Criminal Complaint against Nestor Kirchner (a translated copy of which is attached as Exhibit G).

Id.

Centenary International Corporation SEC Form 10-K (a copy of which is attached as Exhibit H).

[&]quot;Courts Launch Investigation of Cristóbal López Slot Machines", LA NACIÓN, May 6, 2014 (a translated copy of which his attached as Exhibit I); "Complaint Filed Against Board of Directors of Lotéria Naciónal for Lack of Controls", LA NACIÓN, Apr. 7, 2014 (a translated copy of which his attached as Exhibit J). Val de Loire's parent company, Correon SA, is a spinoff of one of the companies now under investigation and appears to have extensive and continuing commercial dealings with it. See Amended Criminal Complaint with Proposal of Evidence against Nestor Kirchner (a translated copy of which is attached as Exhibit F); Official Gazette of the Argentine Republic (a translated copy of which is attached as Exhibit K).

[&]quot;Judicial Green Light to Investigate Cristóbal López's Slot Machines", EL CRONISTA COMERCIAL, May 6, 2013 (a translated copy of which his attached as Exhibit L).

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three allegedly embezzled millions of pesos from public-infrastructure projects and laundered the proceeds and other embezzled funds through Panama and various international shell corporations. The investigation's lead prosecutor, José María Compagnoli, authored a report stating that Baéz laundered \$65 million through 150 Nevada corporations. The report also states that all 150 Nevada corporations have the same director, Aldyne, Ltd., a Seychellois corporation. After submitting the report to Argentina's National Supreme Court of Justice, the Kirchner government retaliated and removed Compagnoli from office.

Id. at *1.9 NML possesses documents that connect the Baéz Entities to Aldyne and the Seychellois entities and that indicate the involvement of other entities: MF Nevada, Gairns Ltd., and Mossack & Fonseca. Id. at *2.10 These Documents indicate that Baéz Entities have received capital transfers totaling millions of dollars—most of which came from a mysterious entities in the Seychelles. Id.

C. Val de Loire's Connections To López, Baéz, And The Baéz Entities

Through discovery obtained from the Baéz Entities' registered agent, MF Nevada, NML has learned of an apparent connection between Val de Loire, López, Baéz, and the Baéz Entities. Val de Loire is a holding company that is named in a 2010 supplemental criminal complaint filed in Argentina against Néstor Kirchner. 11 According to the complaint, Val de Loire is a 35% owner of Correon SA; an entity that partners with López's company Casino Club SA in gambling projects that have been tainted by widespread allegations of political corruption. ¹² Correon SA is also identified in SEC filings as an investor-partner of the López-controlled vehicle Casino Club S.A.¹³

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Id.

Campagnoli Report (a translated copy of which is attached as Exhibit M); Campagnoli Dictamen (a translated copy of which is attached as Exhibit N).

Operating Agreements of Agrocomtra USA LLC, Best World Supplies Ltd, Cosmetech LLC, Dolfin Trading LLC, Mercury Consultants LLC, Thunder Overseas Trading LLC, and Steel Product Services LLC (copies of which are attached as Exhibit O).

Amended Criminal Complaint with Proposal of Evidence against Nestor Kirchner (a translated copy of which is attached as Exhibit F).

Pinnacle Entertainment, Inc. SEC Form 8-K (a copy of which is attached as Exhibit P).

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Documents produced to NML in response to its August 23, 2013 subpoena to MF Nevada have linked Val de Loire to transactions with two of the Baéz Entities; Fintech Holdings and Balmont Holdings. 14 MF Nevada, the Baéz Entities' registered agent for service of process, also serves as the registered agent for Val de Loire. Further, the Panamanian law firm Mossack Fonseca & Co. appears to represent either Val de Loire itself or the individuals and entities behind it. 15 To cite just one example from the MF Nevada production, MF Nevada produced a letter from MF Nevada's Patricia Amunategui to the Uruguayan law firm of Juan Pedro Damiani, which appears to have represented the beneficial owner of the Baéz Entity Balmont Holdings. ¹⁶ In the letter, Amunategui refers to a number of enclosed documents and describes one of the enclosures as: "Originals of the mutual contracts with the assignment of collateral signed by Mr. Edmund Ward, one of which carries the corresponding certificate of the resident agent and the apostil, and by Val de Loire." Thus, the document indicates that one of the firms in the Baéz

See Excerpt from Production Balmont Holdings Ltd. (a copy of which is attached as Exhibit Q); Excerpt from Production of Fintech Holdings LLC (a copy of which is attached as Exhibit R).

The relationship between MF Nevada and Mossack Fonseca & Co. was explored in length at the September 11, 2014 deposition of Patricia Amunateugi in connection with NML's pursuit of discovery from the Baez Entities. Based on the deposition, NML has learned that: (1) Mossack Fonseca & Co. is MF Nevada's sole client; (2) MF Nevada's has only one employee, and her employment contract was signed by the two founders of Mossack & Fonseca; (3) MF Nevada's sole employee travels yearly to Panama to give presentations to attorneys at Mossack & Fonseca concerning her "products"—meaning ready-to-go Nevada entities that are sold by the sales department at Mossack Fosneca & Co; (4) customers come to Mossack & Fonseca in Panama seeking a Nevada LLC that is "on the shelf" (i.e., MF Nevada has already incorporated the entity and it is ready to be "sold" to customers wishing to own a Nevada LLC); (5) MF Nevada maintains a bank account in Panama to which its sole employee apparently does not have access; (6) MF Nevada's sole employee was instructed by Mossack & Fonseca to sign documents on behalf of Aldyne—a mysterious entity based in the Seychelles at the center of the Baez money laundering scheme; (7) Mossack & Fonseca provides back-office services to MF Nevada including HR, IT, accounting, payroll, etc.; (8) in order to respond to NML's subpoena on the Baez Entities, MF Nevada had to search for the documents on Mossack & Fonseca's platform in Panama. See Transcript of Deposition of Patricia Amunategui, Sept. 11, 2014 (a copy of which will be filed under seal as Exhibit S). It is not at all surprising that Mossack & Fonseca is well known for its money laundering activities. "Shells and Shelves", THE ECONOMIST, Apr. 7, 2012 (a copy of which his attached as Exhibit T); "Insight: In Syrian Sanctions, Some Gains but Much Uncertainty", REUTERS, Nov. 2, 2012 (a copy of which is attached as Exhibit U). Mossack & Fonseca appears to use MF Nevada to assist in this process by creating "on the shelf" LLCs that are ready to sell to a customer at a moment's notice and with little to no due diligence. See Exhibit S at 109:4 – 112:3.

The Damiani firm is well-known for its involvement in Argentine money laundering schemes. See "A Uruguayan Law Firm Played a Key Role in the Route of the K Money", CLARÍN, July 27, 2014 (a translated copy of which is attached as Exhibit V).

The contracts in question were not included in MF Nevada's production to NML; nor was there any indication of what collateral was assigned, so the exact relationship between Val de Loire and Balmont Holdings

network suspected of money laundering (Balmont Holdings) had business dealings with Val de Loire.

II. The Subpoena And Val de Loire's Refusal To Meet And Confer In Good Faith.

On August 27, 2014, NML served the Subpoena on Val de Loire through its registered agent, MF Nevada. The Subpoena includes sixteen reasonably focused requests. The Subpoena asks Val de Loire for information relating specifically to 18 individuals (López, Baéz, the Kirchners, and a handful of their family members and business associates) and 6 companies (all connected to López or Baéz). Ex. B (Subpoena at 14-15). For those persons and entities, the Subpoena seeks discrete types of information: principally, information about funds transfers, business operations and assets. *Id.* at 10-11.

On September 24, 2014, through the same counsel who represents the Baéz Entities, Val de Loire moved to quash. It did so without making any effort at all to meet and confer in good faith with NML, as required by Local Rule 26-7(b). When NML raised that concern after receiving the Motion, Val de Loire agreed to a belated meet and confer with NML on October 1, 2014. In that discussion, however, Val de Loire's counsel refused to withdraw the Motion pending further discussions, declined to engage in any substantive discussion of the context of the Subpoena or the authority on which NML relies, and was unwilling to consider any *compromise* to avoid burdening this Court.

ARGUMENT¹⁸

Federal Rule of Civil Procedure 69(a)(2) authorizes a judgment creditor to serve broad discovery in aid of execution—including discovery about the judgment debtor's assets located outside of the jurisdiction of the court where the subpoena is served or the judgment is rendered.

remains unknown.

Despite the requirement under Local Rule 26-7(b), counsel for Val de Loire failed to meet and confer with NML prior to filing the Motion. The Court could deny Val de Loire's Motion on that basis alone. *See Wells Fargo Bank, N.A. v. Iny*, No. 2:13-cv-01561-MMD, 2014 WL 1391055, at *2 (D. Nev. Apr. 9, 2014) (denying non-party's motion to quash because the "pending motions suffer from a threshold defect in that they do not contain a proper meet and confer certification."); *see also U-Haul Co. of Nevada, Inc. v. Gregory J. Kamer, Ltd.*, No. 2:12-cv-00231-KJD-CWH, 2013 WL 5278523, at *3 (D. Nev. Sept. 17, 2013) (denying moving party's discovery motion because they "did not satisfy the meet and confer requirements prior to filing this motion.").

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NML has been awarded judgments against Argentina for over \$1.7 billion, and NML has a rig
to any information that may help it trace funds that may have been embezzled from Argentina b
López, Baéz, or other Kirchner associates utilizing the Baéz Entities or Val de Loire itself.

I. NML Is Entitled To Discover Information That May
Lead To Misappropriated Assets Embezzled From Argentina
And Subject To Execution In Satisfaction Of NML's
Judgments, Val de Loire's Motion Should Be Denied.

A. This Court Has Broad Discretion Under Rule 69(a)(2) To Permit Third-Party Discovery That May Reveal The Identity and Location Of Potentially Attachable Assets.

Rule 69(a)(2) of the Federal Rules of Civil Procedure governs discovery in proceedings involving the enforcement of a judgment. Under that rule, a judgment creditor is entitled to obtain discovery from "any person" relating to the judgment debtor's assets "wherever located," including "outside the jurisdiction of the court where the discovery request is made." EM Ltd., 695 F.3d at 207-08 (internal citation omitted); see also NML Capital Ltd. v. Republic of Argentina, No. 2:14-cv-492-RFB-VCF, 2014 WL 3898021, at *3 (D. Nev. Aug. 11, 2014) ("NML Capital"). Rule 69(a)(2) entitles a judgment creditor "to identify assets that can be used to satisfy a judgment" and "to discover concealed or fraudulently transferred assets." VFS Fin., Inc. v. Specialty Fin. Corp., No. 3:09-cv-00266-RCJ-VPC, 2013 WL 1413024, at *3 (D. Nev. Apr. 4, 2013 (internal citations omitted); see also Nat'l Serv. Indus., Inc. v. Vafla Corp., 694 F.2d 246, 250 (11th Cir. 1982) ("judgment creditor is entitled to discover the identity and location of any of the judgment debtor's assets, wherever located."). As a result, discovery under Rule 69 is "quite permissive." NML Capital, 2014 WL 3898012, at *4 (citing Republic of Argentina v. NML Capital, Ltd., 134 S. Ct. 2250, 2254 (2014)); 8A Charles A. Wright & Arthur R. Miller, Federal Practice and Procedure: Civil 3d § 3014, p. 160-62 ("The scope of examination is very broad, as it must be if the procedure is to be of any value.").

The liberal standard for post-judgment discovery applies with equal force to discovery sought from third-parties. Rule 69(a)(2) expressly permits discovery from "any person," and thus, "[a] judgment creditor may obtain discovery from both parties and non-parties alike." VFS

Fin., Inc., 2013 WL 1413024, at *4 (quoting Henry v. Rizzolo, No. 2:08-cv-00635-PMP-GWF 2012 WL 13725, at *3 (D. Nev. Jan. 4, 2012)); see also NML Capital, 2014 WL 3898012, at *4; EM Ltd., 695 F.3d at 207 ("It is not uncommon to seek asset discovery from third parties . . . that possess information pertaining to the judgment debtor's assets.") (citation omitted). A subpoena "reaches all responsive materials within the corporation's control, even if those materials are located outside" the court's jurisdiction. NML Capital, 2014 WL 3898012, at *4 (quoting Eitzen Bulk A/S v. Bank of India, 827 F. Supp. 234, 238-39 (S.D.N.Y. 2011)).

Applying these rules, courts in Nevada and elsewhere commonly allow judgment creditors to conduct "very broad" discovery of "information from parties and non-parties alike—including information about assets upon which execution can issue or about assets that have been fraudulently transferred." *Henry*, 2012 WL 13725, at *3; *see also 1st Tech., LLC v. Rational Enter. LTDA*, 2:06-cv-01110-RLH-GWF, 2007 WL 5596692, at *4 (D. Nev. Nov. 13, 2007) (post-judgment discovery has "broad scope"). Judge Griesa of the Southern District of New York, before whom the litigation between NML and Argentina has been pending for over twelve years, has ruled repeatedly that NML is entitled under the Federal Rules to broad discovery in aid of its judgment enforcement efforts. ¹⁹

B. Post-judgment Discovery Is Warranted As Long As The Judgment Creditor Can Make A Threshold Showing That Connects The Third-Party With Discoverable Information.

Under Rule 69, a judgment creditor can follow either of "two paths for propounding discovery on third-parties: federal law or the state law in which the district court sits." *NML Capital*, 2014 WL 3898012, at *4. "In both cases, the judgment creditor must make a threshold showing connecting the third party with discoverable information before propounding discovery on the third party." *Id.*

To do so "[u]nder federal common law, the judgment creditor must show either (1) 'the necessity and relevance of [the] discovery sought' or (2) that 'the relationship between the

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Transcript of *EM Ltd. & NML Capital Ltd. v. Republic of Argentina*, Feb. 2, 2007 (a copy of which his attached as Exhibit A) ("[P]laintiffs in these actions should be allowed some liberality in exploring means of enforcing their judgments.").

judgment debtor and the nonparty is sufficient to raise a reasonable doubt about the bona fides of the transfer of assets." *Id.* (quoting Wright & Miller, *supra*, p. 162 (citing *Tr. of N. Florida Operating Eng'g Health & Welfare Fund v. Lane Crane Serv., Inc.*, 148 F.R.D. 662, 664 (M.D. Fla. 1993); *Strick Corp. v. Thai Teak Prod. Co., Ltd.*, 493 F. Supp. 1210, 1218 (E.D. Pa. 1980)).

"Under Nevada law, the judgment creditor must show that 'the relationship between the judgment debtor and nonparty raises reasonable suspicion as to the good faith of asset transfers between the two." *Id.* (quoting *Rock Bay, LLC v. Dist. Ct.*, 129 Nev. Adv. Op. 21, 298 P.3d 441, 443 (2013)). "Reasonable suspicion exists 'if there are specific, articulable facts' in support of the inference that the asset transfers were not made in good faith." *Id.* (quoting *State v. Cantsee*, 130 Nev. Adv. Op. 24, 321 P.3d 888, 893 (2014)).

As this Court explained in an August 11, 2014 Opinion resolving a related discovery dispute: "[i]f the judgment creditor satisfies either standard, Rule 69 opens the doors of discovery and permits the judgment creditor to use any discovery device afforded by the Federal Rules." *Id.*

C. NML Seeks Information That Is Relevant To Its Ongoing Post-Judgment Execution Efforts.

NML is entitled to discovery because it has made a threshold showing that connects Val de Loire to a web of shell companies associated with a suspected scheme to embezzle Argentine assets—assets that NML could potentially attach in satisfaction of its judgments. NML meets that threshold under either federal common law (showing the relevance of asset transfers involving Val de Loire) or Nevada law (asserting "specific, articulable facts" supporting the inference of how Val de Loire has information concerning the embezzlement scheme).

1. Suspected embezzlement of Argentine property by Cristobal López.

As detailed above, *see supra* at Part I, and in the "Background Information" to the Subpoena, NML has reason to believe that an illicit relationship among López and the Kirchners may have allowed López to misappropriate millions of dollars in Argentine state assets—assets that are now hidden around the world. Numerous Argentine criminal and journalistic investigations have targeted López's activities and his allegedly improper benefits from his

relationship with the Kirchners since Néstor Kirchner became Argentina's president in 2003. Accusations have centered on López's improper and potentially illegal acquisition of lucrative hydrocarbon and gambling concessions. For example, Argentine judge Rodolfo Canicoba Corral recently opened a formal investigation into two of López's casino operations for defrauding the government, tax evasion, and colluding with public officials to violate the requirements of their positions.

2. <u>Val de Loire is a shell company affiliated with López.</u>

Val de Loire is a holding company that owns 35% of Correon SA, which partners with a López-owned company, Casino Club SA, in gambling projects that have been tainted by widespread allegations of political corruption. U.S. Securities and Exchange Commission records identify Correon SA as an investor-partner of the López-controlled vehicle Casino Club SA.²⁰

3. <u>Val de Loire and López are both linked to Lázaro Baéz.</u>

Baéz is currently under investigation by Argentine prosecutors for embezzling over \$65 million of state funds out of Argentina through companies in Nevada and elsewhere. In the Baéz proceedings, this Court has already held that NML had valid grounds for subpoening Nevada entities concerning the Baéz Entities.

In response to a subpoena served by NML last year, MF Nevada (the registered agent for both Val de Loire and the Baéz Entities) produced documents that reveal that the López-linked Val de Loire at least periodically does business with some of the Baéz Entities. ²¹ Further, documents produced by MF Nevada suggest that the Panamanian law firm Mossack Fonseca & Co. represents either Val de Loire or the individuals and entities behind it. Mossack Fonseca is known for incorporating shell companies. *NML Capital*, 2014 WL 3898021, at *2.²²

See Pinnacle Entertainment, Inc. SEC Form 8-K (a copy of which is attached as Exhibit P).

See Excerpt from Production Balmont Holdings Ltd. (a translated copy of which is attached as Exhibit Q); Excerpt from Production of Fintech Holdings LLC (a translated copy of which is attached as Exhibit R).

As this Court discussed, there are ample facts that suggest that Mossack & Fonseca controls the 123 Báez Entities, and those same connections suggest its control of Val de Loire. Most obviously, MF Nevada (an affiliate of

4. NML is Entitled to Discovery to Investigate Any Property That May Have Been Embezzled by López, Baéz, or shell entities like Val de Loire.

If the investigations into embezzlement by López and Baéz result in convictions, any funds traceable to the crime may become Argentina's property under both Nevada and Argentine law. *See Robinson v. Goldfield Merger Mines Co.*, 206 P. 399, 401 (Nev. 1922) ("a thief acquires no title to the property which he steals"), *aff'd on re-hearing*, 213 P. 103 (Nev. 1923); *see also Alamo Rent-A-Car, Inc. v. Mendenhall*, 937 P.2d 69, 73-74 (Nev. 1997); Argentine Criminal Code, Art. 23, Art. 303²³; *see also NML Capital*, 2014 WL 3898021, at *5. NML therefore has a right to seek discovery to find information that helps trace those assets. It has done so by issuing a Subpoena asking Val de Loire for its documents (whether few or many) that relate to 18 individuals (López, Baéz, the Kirchners, and a handful of their family members and business associates) and 6 companies (all connected to López or Baéz).

Just as in *NML Capital*, in which this Court found that NML had met the requisite threshold showing with respect to the Baéz Entities (*see id.*), NML has shown here: (1) that López's alleged money laundering activities involved a Nevada shell company (in this case, Val de Loire); (2) that the shell company at issue concededly has no offices, businesses, or personnel in Nevada (*see* Sept. 25, 2014 Decl. of Edmund Ward for Use in Support of Nonparty Val de Loire, LLC's Mot. to Quash Subpoena or, in the Alternative, for Protective Order); and (3) that MF Nevada and Val de Loire are shell companies controlled by Mossack & Fonseca, which is based in Panama, where Argentine investigators have alleged that Baéz hid embezzled funds (*see id.* at *13 n.12).²⁴ This Court also noted that "there is no doubt that shell corporations are

Mossack & Fonseca, see Mossack & Fonseca Co., Nevada Website Printout (a copy of which is attached as Exhibit W), is the registered agent for Val de Loire—just as it is for the Báez Entities. NML Capital, 2014 WL 3898021, at *5. MF Nevada is apparently Mossack & Fonseca's Nevada-based independent contractor. Id. However, it is evident that the relationship between MF Nevada and Mossack & Fonseca involves a large degree of control by the Panamanian law firm. See Exhibit S.

Argentine Criminal Code, Art. 23 (a translated copy of which is attached as Exhibit X).

This Court also noted that the Báez Entities had the same managers who shared an office in Seychelles. *Id.* at *5. NML only had that information because in the Báez proceedings, MF Nevada produced some documents responsive to the subpoena served upon it. NML now seeks the same type of information, which would further NML's investigation, would help complete NML's factual understanding of the embezzlement scheme and the

routinely formed to commit fraud." *Id.* at *11 (citing *Illinois Bell Tel. Co., Inc. v. Global NAPs Illinois, Inc.*, 551 F.3d 587, 598 (7th Cir. 2008)). Based on such a showing, this Court held that NML had satisfied its threshold showing under Nevada law. *Id.* at *5.²⁵

Notably, Val de Loire has not claimed that it has no responsive documents. Although Val de Loire argues that there is no connection between it and Argentina directly, Val de Loire never denies that it possesses documents concerning the 18 persons and 6 entities associated with López, Baéz, the Kirchners, and the Baéz Entities. Val de Loire's non-denial suggests that it *does* have possession, custody, or control of such documents.²⁶

D. Val de Loire Argues For a Strict Standard For Third-Party Discovery That Is Not Contemplated By The Federal Rules of Civil Procedure.

Tellingly, Val de Loire does not even attempt to distinguish *NML Capital*. Instead, Val de Loire chooses to entirely ignore Magistrate Judge Ferenbach's thoughtful order—despite its obvious relationship to the Subpoena at issue here.²⁷

Rather than addressing *NML Capital* and the numerous cases upon which it relied, Val de Loire relies entirely on a two-page magistrate judge discovery order from a different jurisdiction—a decision that arose in the context of discovery served concerning the assets and activities a sovereign instrumentality that the magistrate judge there determined warranted a heightened threshold for discovery. *See NML Capital, Ltd. v. Republic of Argentina*, C 12-80185 JSW (MEJ), 2013 WL 655211, at *1-2 (N.D. Cal. Feb. 21, 2013) (the "*California Magistrate Order*"). In that case, NML sought to compel Chevron to produce documents relating to a

companies used to further it, and in turn might to lead to the discovery of attachable assets.

²⁵ NML Capital did not address whether NML had met the threshold showing under federal common law. Id.

See Pham v. Wal-Mart Stores, Inc., 2:11-cv-01148-KJD-GWF, 2012 WL 3730565, at *2 (D. Nev. Aug. 28, 2012) ("Documents that are in the actual possession of a third person are deemed to be in the responding party's control if [the responding party] has the legal right to obtain them.") (citations omitted) (insertion in original).

Val de Loire's failure to mention Magistrate Judge Ferenbach's order is an omission of choice—not of mere oversight—because counsel for Val de Loire was also counsel for the objecting Baez Entities who appeared before Magistrate Judge Ferenbach.

Val de Loire fails to mention that the California Magistrate Order is on appeal to the District Court for the Northern District of California. Regardless, even in the unlikely event that the opinion is upheld on appeal, the California Magistrate Order does not apply outside of the context of discovery served concerning a sovereign instrumentality, and it certainly does not bind this Court.

sovereign instrumentality of Argentina. *Id.* at *1. The magistrate judge held not only that NML had to make a "threshold showing" that those entities were alter egos of Argentina, but also that NML had to "overcome the presumption" that a foreign state instrumentality is independent from the state. *Id.* at *2 (citing *First Nat'l City Bank v. Banco Para el Comercio Exterior de Cuba*, 462 U.S. 611, 627 (1983) ("*Bancec*")). The California Magistrate Order did *not* hold, as Val de Loire misrepresents (*see* Motion at 4-5), that NML had failed to make a showing that the instrumentality and Argentina were related. Rather, it held that NML had not "overcome the presumption that [the instrumentality] is a separate juridicial entity for purposes of asset discovery." 2013 WL 655211, at *2.

While the California Magistrate Order denied discovery based on NML's failure to "overcome the presumption" that a foreign state instrumentality is independent from the State, it *granted* NML's other discovery requests. In granting NML's post-judgment discovery seeking information concerning Chevron's dealings with Argentina, the Court noted that "[i]t is not uncommon to seek asset discovery from third parties that possess information pertaining to the judgment debtor's assets ... [n]or is it unusual for the judgment creditor to seek disclosure related to assets held outside the jurisdiction of the court where the discovery request is made." Therefore, "NML may properly seek disclosure from Chevron related to [Argentina's] assets." *Id.* at 3. District Court Judge Jeffrey S. White for the Northern District of California subsequently affirmed the order permitting NML to obtain discovery from Chevron.

In addition to misconstruing the California Magistrate Order and ignoring the applicable law concerning judgment creditors' rights to broad post-judgment discovery, Val de Loire selectively quotes and attacks NML's Subpoena and Background Information while failing to mention the most critical aspect of NML's claims: Val de Loire's connections to embezzled Argentine funds. The Motion criticizes NML's inability to demonstrate a direct connection between Val de Loire and the Republic of Argentina (see generally Mot. at 5-13 (stressing that

Order at 2, *NML Capital Ltd. v. Republic of Argentina*, No. C 12-80185 JSW (MEJ) (Dkt. 9) (a copy of which is attached as Exhibit C).

Order at 2, *NML Capital Ltd. v. Republic of Argentina*, No. C 12-80185 JSW (MEJ) (Dkt. 24) (a copy of which is attached as Exhibit D).

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"there is not a single request regarding the actual judgment debtor—Argentina.")), but Val de Loire either misunderstands or misconstrues NML's rationale for seeking discovery. NML is not claiming that Argentina directly funds or transacts business with Val de Loire; NML contends and cites evidence suggesting—that Val de Loire is one of numerous shell companies (in Nevada and elsewhere) linked to an embezzlement scheme designed to misappropriate Argentine state funds and shelter those assets around the world. If Baéz or López is convicted of misappropriation of state funds, Argentina's property—not the property of any presumptively separate Argentine instrumentality, will be potentially subject to seizure by NML. NML has made a threshold showing that Val de Loire is connected to this scheme, and it is entitled to explore whether Val de Loire has information that would further inform its enforcement efforts.

Producing Responsive Documents Would Not Ε. Impose Any Undue Burden On Val de Loire.

NML is willing to pay Val de Loire's reasonable costs of complying with the Subpoena and would have offered to do so if Val de Loire had been willing to meet and confer in good faith. That willingness resolves any conceivable burden on Val de Loire for producing documents to NML.

Even if that were not the case, NML's subpoena does not impose an undue burden on Val de Loire. "The mere fact that discovery requires work and may be time consuming is not sufficient to establish undue burden." Platinum Air Charters, LLC v. Aviation Ventures, Inc., No. 2:05-cv-01451-RCJ-LRL, 2007 WL 121674, at *6 (D. Nev. Jan. 10, 2007); see also NML Capital, 2014 WL 3898021, at *6-7 (rejecting the Baéz Entities' argument that responding to NML's subpoenas would be unduly burdensome). NML has a good faith basis to believe that Val de Loire is in possession of information that could lead to attachable assets in satisfaction of its judgments against Argentina. This is sufficient to require Val de Loire to comply with the Subpoena.³¹ See Mount Hope Church v. Bash Back!, 705 F.3d 418, 429 (9th Cir. 2012) ("[W]e

In addition, Val de Loire only makes generalized objections and does not specify exactly how complying with NML's subpoena would impose an undue burden. See Diamond State Ins. Co. v. Rebel Oil. Co., Inc., 157 F.R.D. 691, 694 (D. Nev. 1994) ("[G]eneralized and unsupported allegation of undue burden is not sufficient to prevent enforcement of the subpoenas.").

do not think that the mere need to respond to an opponent's advocacy in our civil justice system should be viewed as unduly burdensome when legal arguments are advanced in good faith.").

Finally, although Val de Loire complains that NML's requests are not limited to a particular time frame and in some instances cover an overly broad subject matter (*see* Motion at 15-16), Val de Loire has refused to suggest what it would view as a more reasonable scope for responsive documents. That is precisely the type of discussion that the parties could have had (if Val de Loire had been willing) during a meet and confer, and NML remains willing to discuss reasonable suggestions to narrow any remaining disputes with Val de Loire.

F. Any Concerns By Val de Loire Concerning The Need To Protect Privileged Or Confidential Information Can Be Addressed With An <u>Appropriate Confidentiality Agreement And The Use Of A Privilege Log.</u>

NML is perfectly willing to enter an appropriate confidentially agreement to protect against the dissemination of Val de Loire's confidential information. *See* Mot. at 2. Again, that is precisely the type of concern that Val de Loire could have discussed in a meet and confer rather than raising it with this Court.

Any concerns Val de Loire may have about protecting privileged documents (*see* Motion at 2, 17) can of course be addressed by Val de Loire's production of an appropriate privilege log—a routine practice that, again, need not have been raised as part of a motion to quash.

II. This Court Has the Authority to Order Val de Loire to Identify and Designate Individuals Within the Court's Jurisdiction to Appear for a Deposition or Educate a Witness to Appear.

Rule 30(b)(6) requires a subpoenaed entity to "produce one or more witnesses knowledgeable about the subject matter" in the subpoena. *Great Am. Ins. Co. of N.Y. v. Vegas Const. Co., Inc.*, 251 F.R.D. 534, 538 (D. Nev. 2008). The Federal Rules of Civil Procedure, however, do not require the witness to "have personal knowledge on the designated subject matter." *Id.* Instead, a subpoenaed entity has "a duty to make a conscientious, good-faith effort to designate knowledgeable persons for Rule 30(b)(6) depositions and to prepare them to fully and unevasively answer questions about the designated subject matter." *Id.* at 539 (internal

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quotation marks omitted). "The fact that [the subpoenaed organization] may no longer employ a person with knowledge on the designated topics did not relieve it of the duty to prepare a properly educated Rule 30(b)(6) designee." Great Am. Ins. Co. of N.Y., 251 F.R.D. at 541.

If no employee, representative, or agent of Val de Loire with knowledge of the matters contained in the deposition notice resides or regularly conducts business within a 100-mile radius of Las Vegas, then the Court has the power to compel Val de Loire under Rule 30(b)(6) to designate a representative within 100 miles of Las Vegas and to educate that person concerning the subjects set forth in the deposition notice.

This Court has already analyzed this precise issue and held that third-party shell companies established under Nevada law with a registered agent located in Nevada through which they can be served with process (like Val de Loire) can be ordered to sit for a deposition in Nevada. NML Capital, 2014 WL 3898021, at *11-12 (acting pursuant to its inherent power to enforce judgments under Rule 1 of the Federal Rules of Civil Procedure and ordering the Baéz Entities to produce a witness for a deposition despite having no persons within a 100-mile radius of the district court). Once again, Val de Loire fails to distinguish or to even *mention* Magistrate Judge Ferenbach's order.

Similarly, the United States District Court for the Southern District of New York recently addressed the requirement that a subpoenaed non-party must educate a witness to testify on its behalf at a deposition. In Wultz v. Bank of China Ltd., 298 F.R.D. 91 (S.D.N.Y. 2014), a bank in Israel moved to quash a third-party subpoena seeking deposition testimony under Rule 30(b)(6), arguing that it employed no knowledgeable employees in the forum and that educating an inforum employee was "simply not reasonable or practicable." Id. at 99. The court denied the bank's motion to quash, reasoning that "[e]ven if [the Israeli bank] is a non-party witness and all of the documents or knowledgeable persons are in Jerusalem, compliance with the 30(b)(6) subpoena is not an undue burden when weighed against" the parties' need for the testimony. *Id.* An in-forum representative could "easily be educated" by a person knowledgeable about the topics by "telephone, email or videoconference," and the bank could "avoid the burden of educating a[n] [in-forum] employee altogether by agreeing to a deposition by video." *Id.*

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As in NML Capital and Wultz, this Court may require Val de Loire to designate a representative to testify at a deposition concerning the subjects of the subpoena. Wultz, 298 F.R.D. at 99. If Val de Loire has no employees, representatives or other agents within the district who are knowledgeable about the subjects of the subpoena, Val de Loire has a duty to educate a representative to appear for a deposition. *Id.*

Although Val de Loire (an entity organized under the laws of Nevada) claims that no authorized representative resides, is employed, or regularly conducts business in person within 100 miles of Las Vegas (Ward Decl. ¶¶ 5-7), several individuals and entities affiliated with Val de Loire may satisfy the geographic limitations for a deposition. For example, MF Nevada is located in Las Vegas and serves as the registered agent for Val de Loire. In addition, Mossack Fonseca & Co. markets its Nevada SPV-creation services on its corporate website, which suggests that representatives from Mossack Fonseca may visit Nevada to conduct business on a regular basis. Moreover, counsel for Val de Loire may be an appropriate deponent, should no other suitable representative exist. See Shelton v. Am. Motor Corp., 805 F.2d 1323 (8th Cir. 1986) (a court may order counsel to appear as a witness upon a showing of no other means to obtain the requested information, and that the information is crucial to the requesting party's case); Couturier v. Am. Invsco Corp., No. 2:12-cv-01104-APG-NJK, 2013 WL 4499008, at *1 (D. Nev. Aug. 20, 2013) (same).

Regardless of whom Val de Loire chooses as its representative, requiring Val de Loire to educate a witness within the Court's jurisdiction does not impose an undue burden. It "is merely the result of the concomitant obligation from the privilege of being able to use the [organizational] form in order to conduct business." See Great Am. Ins. Co. of N.Y., 251 F.R.D. at 540; see also S.E.C. v. Banc de Binary, Case No. 2:13-cv-00993-RCJ-VCF, 2014 WL 1030862, at *7 (D. Nev. Mar. 14, 2014) (stating that permitting a defendant to "benefit from its status as a foreign corporation after it has exploited its appearance as an American company would be fundamentally inequitable."); Less v. Taber Instrument Corp., 53 F.R.D. 645, 646 (W.D.N.Y. 1971) ("[B]y doing business in a particular judicial district, a corporation submits itself fully to the jurisdiction of the court of the district."); Metro-Goldwyn-Mayer Studios, Inc. v.

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Grokster, Ltd., 218 F.R.D. 423, 424-25 (D. Del. 2003) (requiring an entity to bring a witness into the state to be deposed "is not an unreasonable requirement . . . given [the entity's] decision to establish corporate residency here.").

Finally, the cases that Val de Loire cites for the proposition that Rule 45 requires this Court to quash NML's subpoena are inapposite. In those cases, either: (a) the subpoenaed nonparty did not reside in the forum state; or (b) there was another jurisdiction within the United States where the subpoenaed person could comply. 32 In contrast, Val de Loire—an entity incorporated under Nevada law—resides in Nevada. See NML Capital, 2014 WL 3898012, at *10 (citing *Dexia Credit Local v. Rogan*, 629 F.3d 612, 620 (7th Cir. 2010)).

Consistent with the overwhelming authority and with the prior determination by Magistrate Judge Ferenbach, NML respectfully requests that the Court order Val de Loire to designate a representative to testify in response to NML's subpoena.

See Relational, LLC v. Hodges, 627 F.3d 668, 673 (7th Cir. 2010) (U.K. resident); LT Int'l Ltd. v. Shuffle Master, Inc., 2:12-CV-1216-JAD-GWF, 2014 WL 3734270 (D. Nev. July 29, 2014) (non-resident Canadian corporation); Nordotek Enviro. Inc. v. RDP Tech. Inc., No. MC410-24, 2010 WL 3070196 at *1 (S.D. Ga. Aug. 5, 2010) (Norwegian corporation that did no business in Georgia); Matthias Jans & Associates, Ltd. v. Dropic, No. 01-MC026, 2001 WL 1661473, at *1 (W.D. Mich. 2001) (non-party could comply with subpoena issued from Ohio in Michigan, where she resided); Price Waterhouse LLP v. First Am. Corp., 182 F.R.D. 56 (S.D.N.Y. 1998) (nonresident British partnership); Regents of Univ. of California v. Kohne, 166 F.R.D. 463 (S.D. Cal. 1996) (non-party subpoenaed in California could comply with subpoena in Illinois).

	1	CONCLUSION
	2	For the foregoing reasons, NML respectfully requests that this Court deny Val de Loire's
	3	Motion and grant NML's cross-motion to compel.
	4	DATED this 9 th day of October 2014.
	5	BROWNSTEIN HYATT FARBER
	6	SCHRECK, LLP
	7	By: /s/ Nikki L. Baker Virk B. Laphard Ess
	8	By: <u>/s/ Nikki L. Baker</u> Kirk B. Lenhard, Esq. Nevada Bar No. 1437 Nikki L. Baker, Esq.
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Whitaker, and	MR. WCODS: Kent Woods, Woods Erickson Wh	24
yaana ka kan	of NML Capital Limited.	23
ness on behalf	LLP in New York. I'll be examining the witness	22
om Dechert,	MR. HRANITZKY: I'm Dennis Hranitzky from	21
- SANCE - STORE OF	the reporter will administer the oath.	20
elves and then	Will counsel please identify yourselves	19
goderjanu en Stendag	Reporting Services.	18
th Oasis	court reporter is Ellen Goldstein. We're with	17
Johnson. The	No. 2:14-cv-492-RFB-VCF. My name is John Joh	16
case	Limited versus The Republic of Argentina," ca	15
"NML Capital	District Court, District of Nevada, entitled	14
ed States	Henderson, Nevada. This case is in the United	13
re, Suite 200,	Erickson & Whitaker, 1349 West Galleria Drive,	12
offices of Woods	The time is 8:51 a.m. We are at the law offi	11
nber 11, 2014.	Patricia Amunategui. Today's date is Septembe	10
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questions I ask that doesn't make sense to you, that you	25
I'm going to ask you that if there's anything in the	24
forth in the subpoena that I'll show you in a moment.	23
you some questions this morning regarding the matters set	22
represent NML Capital Limited and I'm going to be asking	21
with a law firm in New York called Dechert, LLP. I	20
Q My name is Dennis Hranitzky. I'm an attorney	19
A Good morning.	18
Q Good morning, Miss Amunategui.	17
BY MR. HRANITZKY:	16
EXAMINATION	15
	14
and testified as follows:	13
was first duly sworn by the Certified Court Reporter	12
called as a witness by and on behalf of the Plaintiff,	다 다
PATRICIA AMUNATEGUI,	10
	9
Spanish and from Spanish into English.	œ
translate the following proceedings from English into	7
an interpreter of the Spanish language, was duly sworn to	9
GRACIA M. FELDMAN,	ហ
	4
that are interested parties in this litigation.	ω
MR. WILEY: Jason Wiley on behalf of the 123 entities	N
Nevada, Limited.	1
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Page 8 1 please say so so that I can make my questions more clear 2 to you. Does that make sense? 3 A Yes. 4 Q Okay, thanks. 5 First, could you state your name for the record. 6 A Patricia Amunategui. 7 (Through the interpreter) Patricia Amunategui. 8 Q And you were born in Chile; is that right? 9 A Yes. 10 Q And you moved to the United States at some 11 point, yes? 12 A Yes. 13 Q In fact you've come to the United States twice; 14 is that right? 15 A Yes. 16 17 18 29 20 21 21 21 22 23 24	702-476-4500	vw.oasisreporting.com OASIS REPORTING SERVICES, LLC	www.oasisreporting.com	www.oas
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	more	say so so that I can make my	please	μ.
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And I always come back here periodically.

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Okay.

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17 14 13 12 11 10 19 18 16 15 24 23 22 21 20 œ 9 your employment history up through the time you went to from 2005 probably or 2006 part time in different casino no. of one of the vice president. my last Bally's. still don't work right away. work for Bally's around 2005. work with A O A 0 0 0 was here at that time. don't speak English, so I didn't work; but I work job when I moved here. Okay. To TO In In During the period of -- with my first arrived, Chile and in this country. this country, not what I do the United States, the United States? my first job was here at the casino, Can you just very briefly take us through In Were you working during that period? Chile I work for Bank Santander, I wait two year or And when I move here I yes, I worked as a secretary because my husband in something Chile? Was at

19 18 17 16 5 14 13 12 11 10 23 22 21 20 9 9 S 10 San Francisco. machine did you college to learn English during that period of time. English enough. take longer for because, moved I open a business there, when I was living here and from California and I start a then I had my own business too. tanning-bed salon in Chile. O 0 O A 0 went to Chile. work for a radio station, insurance company, and have other jobs? from this one thing, my An innovator. I have a tanning-bed salon in Chile and I bring What was your business? Oh, yeah, many. I try to give you the short I see. No. Was that at UNLV? Between 2005 and 2007. In between the time Very innovator, very fun right. It was a community college I lived in San Francisco at that time work, but at the same Before you worked at Santander in Chile, So I went to school. country. And that was sometime between I bought some tanning bed here document of the legal residence That 1 It was very fun. Was I was the first one open my time I don't have I went to second period

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Do you mean 1995?

24

then moving back.

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y rour counsel has asked that we have the	67
Warran and a same of the same)
BY MR. HRANITZKY:	24
THE WITNESS: Okay.	23
you understand.	22
MR. WOODS: and translate before so she makes sure	21
THE WITNESS: Okay.	20
translator can do her job	19
know, wait for him to finish his question so the	18
MR. WOODS: Hopefully, as things progress you	17
THE WITNESS: Okay.	16
answer. It will make it easier for the court reporter.	15
MR. WOODS: Let him finish his questions before you	14
A Yeah, all secretarial.	13
Q Were those secretarial or	12
A Yes.	11
Q And another position?	10
A Uh-huh.	9
an insurance company?	∞
Q And in your jobs before Santander, you mentioned	7
business secretary, assistant.	6
A No. I went for private school for secretary,	ر ت
go to university or college in Chile?	4
Q It's okay. And in Chile did you have did you	ω
exist.	2
A Oh, yeah, nineties. Before probably I'm not	Ľ
Page II	

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second language, and then I went to UNLV for the	25
THE WITNESS: Different other stuff, I mean English a	24
THE REPORTER: Started what?	23
started different	22
A $$ I don't remember exactly the years 'cause I	21
Q And when was that?	20
A Yes.	19
at UNIV?	18
Q I see. At one point did you obtain an education	17
A 2006.	16
Q Okay. So until when?	15
A Eleven year maybe.	14
casino?	13
Q Okay. And for how long did you work in the	12
A (Through the translator) Yes, the second time.	11
in Las Vegas; is that right?	10
following your return, you went to work for a casino here	9
Q Okay. And when you returned, at some point	8
A Yes, the second time.	7
in around 1997. Is that right?	<u>ه</u>
Q So you said you came back to the United States	σ
A Okay.	4
\mathbb{Q} so we should do it that way.	ω
A Okay.	2
translator's assistance for all of the questions	Н
12	Page

o. I take classes. I don't remember exactly s, but I take more classes after. Okay. And how approximately how long did you UNLV? I will say I was in and out for two year Yeah, probably, yeah. Okay. So and you say you graduated from UNLV in Okay. So and you say you graduated from UNLV in Uh-huh. And you said you worked in the casino until 15 MF Corporate Servence 16 A 2001 I ivolated from the casino until 17 Q Okay. in 18 hand you two documents of the casino until 20 look at them and 21 A Can I to 22 Q Of course of the casino until 23 (Discussion of the casino until) 24 Spanish.) THE WITNESS:	And how 1 say I was i h, probably, So and you h. ou said you v
o. I take classes. I don't remember exactly s, but I take more classes after. Okay. And how approximately how long did you UNLV2 I will say I was in and out for two year Yeah, probably, yeah. Okay. So and you say you graduated from UNLV in Okay. So and you say you graduated from UNLV in Okay. So and you say you graduated from UNLV in 21 A Can I t 22 Q Of cour Oh-huh. Oliscus And you said you worked in the casino until	Study at UNLV? A I will say I was i probably. Yeah, probably, Q Okay. So and you 2000? A Uh-huh. Q And you said you w
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take classes. I don't remember exactly 15 MF Corporate Ser t I take more classes after. And how approximately how long did you 18 hand you two doc	Q Okay. And how study at UNIV?
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5. I take classes. I don't remember exactly 15 MF Corporate Services, but I take more classes after. 16 A 2001 I	
o. I take classes. I don't remember exactly 15 MF Corporate Serv	I take more classes
taw, I tilling tile of trans tildt traps.	take classes.
law I think they offer and I take that	14 corporate law, I think they offer, a
I went for more classes of paralegal and I take 13 the casino.	went for more classes of
else at UNIV? 12 A I work for MF Corporate Service	a t
Other than paralegal studies, did you study 11 Q Okay. What was the other job?	than paralegal
10 than six years.	10 yeah.
I have a certification of paralegal from UNLV, 9 A Yes, yes. I worked two job for	have a
And do you have a degree from UNLV? 8 Q besides the casino?	do you have a degree
I can't give you sure, but I think it was 2000.	can't give you sure, but
In 2000? 6 other employment	6 Q In 2000?
I think I finish in 2000, 2000 probably. 5 Q Yes. Between 2000 and 2006 did:	think I finish in 2000,
And when did you finish? 4 A Can you repeat again. Sorry.	did you
RANITZKY: 3 employment besides the casino?	3 BY MR. HRANITZKY:
when I finished. It was a long way. 2 Q Between 2000 and 2006, did you h	finished. It was a
l course; but I don't remember when I started. I 1 A Yes.	I don't
Page 13 Page 14	

23		22 0 (21 A	20 look at tl	19 and one h	18 hand you	17 0	16 A :	15 MF Corporate	14 0	13 the casino.	12 A	11 0	10 than six	9 A	80	7 A	6 other emp	5 D	4 A	3 employment	2 0 :	1 A	Page 14	
	(Discussion held off the stenographic record in	Of course.	Can I take my glasses?	them and let me know if you recognize them.	has been marked as Exhibit 1. I'd ask you to	two documents. One has been marked as Exhibit $\boldsymbol{0}$	Okay. I'm going to ask the court reporter to	2001 I believe, 2001 probably.	ate Services?	I see. When did you start to work for	•	I work for MF Corporate Service and I work for	Okay. What was the other job?	years.	Yes, yes. I worked two job for six for more	besides the casino?	Yes.	employment	Yes. Between 2000 and 2006 did you have any	Can you repeat again. Sorry.	t besides the casino?	Between 2000 and 2006, did you have any other	Yes.		

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exhibit.	Sorry. It is the last page of the exhibit.	25 Q So1	

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Page 15 1 I receive, and I believe it is mine. 2 BY MR. HRANITZKY: 3 Q Okay. So you recognize Exhibit 0 as a subpoena 4 that you received? 5 A I'm looking for my name. 6 Q Look on the first page. Your name should be 7 there. Do you see on the first page it says NML Capital, 8 Republic of Argentina? 9 A Yeah, yeah, I see oh, I see my name, yes. 10 Okay. I was looking for my name. 11 Q Okay. You can put that aside. 12 A I don't want to get that confused with the other 13 one. 14 Q Exhibit 1, do you recognize Exhibit 1? 15 A Well, I believe it's my contract agreement, my 16 employee contract agreement. 17 Q So you recognize this as your employment 18 contract with MF Corporate Services Nevada Limited? 19 A Yes. I want to be sure. Yeah. 20 Q Could I ask you to look on the last page. 21 A Uh-huh. 22 Q Actually it's not the last page of the exhibit. 23 It's the last page of the contract.		Sorry. It is the last page of the exhibit.	Ø	25	
Page I receive, and I believe it is mine. BY MR. HRANITZKY: Q Okay. So you recognize Exhibit 0 as a subpoen that you received? A I'm looking for my name. Q Look on the first page. Your name should be there. Do you see on the first page it says NML Capita Republic of Argentina? A Yeah, yeah, I see —— oh, I see my name, yes. Okay. I was looking for my name. Q Okay. You can put that aside. A I don't want to get that confused with the othone. Q Exhibit 1, do you recognize Exhibit 1? A Well, I believe it's my contract agreement, my employee contract agreement. Q So you recognize this as your employment contract with MF Corporate Services Nevada Limited? A Yes. I want to be sure. Yeah. Q Could I ask you to look on the last page. A Oh-huh. Q Actually it's not the last page of the exhibit It's the last page of the contract.		Okay.	А	24	
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I receive, and I believe it is mine.	4 000000000000000000000000000000000000	HRANITZKY:	MR.	2	
		and I believe it is		J	
	U				

25	24	23	22	21	20	19	18	17	16	15	14	13	12	H	10	9	∞	7	D	IJ	4	ω	2	ш	Page
							A Yes.	Citizenship number.	Social Security nun	Q Yes, yes.	A This (indi	Exhibit 1	Q Okay. So	only time I see the	A I can't re	Q Okay.	A I never see	Mr. Mossack and Mr.	Q All right.	A Yes, I do.	Q Do you rec	A Okay.	Q Yes.	A You're tal	e 16
	nec - o g anni	ng mga mga mga mga mga mga mga mga mga mg		Million and services are services are services and services are services and services are services are services and services are services are services and services are services are services are services are services are services and services are servic	apparate (spirits)		MACON-TON	·	number and U.S. Certificate of	In the first paragraph it lists a	(indicating)?	n haan shaka	if we could turn to the first page of	e signature.	recognize the signature. This is the		ee the signature before, so I assume.	. Fonseca?	. And you recognize the signatures of		recognize your signature?	on career		talking this page (indicating)?	on and a second

Okay.

So --

UNLY for ask people they speak Spanish.

restaurant for -- with my resume.

I think they went to

8 7

know I think, something meet, and people from

me MF

Corporate Service was here and introduce me and called for an interview; and I have to be -- meet them in a

0 0

D

I don't remember where. Was a person

my son

you were later hired for?

H C W A

O

Okay.

So how did

you become aware of this

Page

17

potential position with MF Corporate Services Nevada

that

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23 21 20 19 8 17 16 15 13 22 I was very tired at that time finish my school, but I never -it to them because I get called. list probably of the students speak Spanish. They give through UNIV? graduate. potential offer job for the student that are ready to thought it was a good opportunity. O A in I don't learn about opportunity. They have the So you think you learned about the opportunity And the paralegal service, sometime they put get contacted, yeah. fact I never was looking for the second job. So you were contacted I get contact. I say yes

22 21 19 8 17 16 15 14 13 12 <u>├</u>--} 10 23 20 9 ∞ 7 9 S 4 ω 18 ME suitable for a job with MF Corporate Services Nevada? anyone in the area who spoke Spanish and who might be Services asked people from the hotel if they we have a clear record. the first information I know about it. somebody with Spanish language in this town. think, so they -they speak Spanish -- in fact they are from Argentina restaurant/hotel where these people stay; and because invited person for the wedding was in the same son may have had some role in this. What was his role? Corporate Services asked people at the hotel --0 A A 0 D 0 A O Yes. Yes. Somebody. I see. Well, no. Is that right? So you think that people from MF Corporate If you would, just let me finish my question so At the hotel if they --All right. if they knew of people --So people from the -- people from you know, they asked if they know My son got married, and one of the And I think you mentioned that your knew That's what of Н

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Nevada made these inquiries?

24

0

Do you recall who from MF Corporate Services

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L	payroll, so no.	25
	A I don't know. I don't know. It's not in the	24
	Nevada?	23
	Q Does she still work for MF Corporate Services	22
	here.	21
2003-Y	touch with her in case I need something when she was not	20
	She take vacation and then come back, and I always was in	19
	A She work up here she work a long time after.	18
	MF Corporate Services Nevada after you started there?	17
	${\tt Q}$ I see. And how long did Nancy work at	16
	for another company. Probably. I don't know.	15
	That's the person was here. I don't know if she worked	14
T-10-10-10-10-10-10-10-10-10-10-10-10-10-	training and she hire me. She sign this contract.	13
	A Probably. I don't know. I meet her. She do my	12
	company at that time?	11
	Q Do you know if Nancy worked for any other	10
	A Yes.	9
	Q For MF Corporate Services Nevada?	8
	A Nancy worked for MF Corp., yeah.	7
anning as related	Nevada?	б
	Q And did Nancy work for MF Corporate Services	_ل
	last name. Was a long time ago.	4
	A Her name was Nancy, but I don't remember the	ω
	Q Who what was her name?	2
392,000,000,000	A Yes, the lady I meet after.	Н
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- 10 J.	So you met them in connection with	ю 8	25	
1	on about the jurisdiction.	presentation	24	
	- explaining and offer the product and give a	A	23	
	Okay.	Ø	22	
	- so I meet them in one of my trip to Panama	how it's -	21	
and the second s	int presentation about what is your product and	do PowerPoint	20	
	couple time I have to be in some event where you	one cou	19	
	jurisdiction and I have to market this Nevada, and	Nevada jur	18	
	During my period of work I learn a lot about the	A D	17	
er en produce de la company	à.	Mr. Fonseca?	16	
ac. vd. 25.999 (376)	Okay. At what time have you met Mr. Mossack or	Ø	15	
	Not in that time. Later, very later.	A	14	
	Did you meet with them?	Ø	13	000000000000000000000000000000000000000
	Never.	A	12	
	Did you speak with Mr. Mossack or Mr. Fonseca?	D	11	
	Only with Nancy, all right.	Ø	10	
	No. Only with Nancy.	A	9	
	12	were hired?	ω	
4 144 150	job at MF Corporate Services Nevada before you	about the	7	
	see. Did you meet or speak with anyone else	I Ø	0	
		her.	رت ن	
	young person, but I don't know anything about	was not a	4	
	Probably she get retired, but because she	surgery.	ω	
	No. I hear long time ago because she had a	A N	2	***************************************
	Do you ever hear from Nancy nowadays?	Ø	ь	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,
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think English is working, but for the more complicated	25	Q How often do you go to Panama?	25	, i
Q For the short answers and the easy answers, I	24	A Yes.	24	
A Okay.	23	Q And always in Panama?	23	
Q and the translator translates it.	22	working.	22	
A Yeah.	21	MR. HRANITZKY: Well, I think this is still it's	21	
the question in Spanish	20	the same type of setting."	20	
be times when I actually suggest that perhaps you answer	19	THE INTERPRETER: Oh, she said in Spanish, "always in	19	
Q In fact, if your counsel doesn't mind, there may	18	setting." Can you translate so the court reporter can	18	
BY MR. HRANITZKY:	17	MR. WOODS: She said "siempre in the same kind of	17	
THE WITNESS: Oh, okay, okay.	16	and marketing event.	16	
translate it.	15	A Uh-huh, yes, siempre in the same kind of setting	15	
Spanish, if you don't know what it is, and she'll	14	Q Was it always in the same kind of setting?	14	
that's what the translator is for. You can say it in	13	A I will say three time.	13	
if there's a word that you don't quite know what it is,	12	Q Approximately how many times?	12	
MR. WOODS: If I can, Patricia, like happened before,	11	A Yes, yes.	11	
was last February probably when I went.	10	than one occasion?	10	
recall when is the last time, but I think my last time	9	Have you met Mr. Mossack and Mr. Fonseca on more	9	
year, but it's all depend when is the event. I don't		everything down.	- ∞	
about any new change of product. Normally it's one a	7	question before you answer so the court reporter can get	7	
everybody bring myself, I bring whatever is new here	0	Q I see. Just if you would, let me finish my	6	
A Summit so we can learn about different	5	names, but I meet at that time.	رت ن	
Q Summit?	4	A with many other people. I can't remember	4	
summit.	ω	Q like that?	ω	
have this how they call it marketing event or	2	A I met with them	2	
A Well, don't depend on me. Depend on if they	ш	presentations		
e 22	Page	Page 21		
The state of the s			7	

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complicated	think English is working, but for the more complicated	h is working,	25 think Englis	o grande

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25	24	23	22	21	20	19	18	17	16	15	14	13	12	₽ ₽	10	9	∞	7	D	U	4	ω	2	ш
	A I don't remember,	described?	purposes other than to attend the kinds of symposiums you	Q But in the past, have you gone for business	BY MR. HRANITZKY:	purpose if I would.	THE WITNESS: I will say yes. I like to go for other	MR. WOODS: So is that a "no" or is that a "yes"?			A I like Panama.	to attend these kinds of symposiums?	Q Do you go to Panama for any purpose other than	A Okay.	Q I think we're fine. Just going forward.	that I didn't understand?	(Through the interpreter) So is it something	A Okay.	Q Okay?	A Okay.	interpreter.	Q it may be best if we go through the	A Okay.	answers

or things of that nature for MF Corporate Services	25
Q Have you seen any corporate formation documents	24
A Uh-huh.	23
Q Other than signing employment contracts?	22
A Not that I see it, no.	21
Q None that you	20
A No.	19
behalf of MF Corporate Services Nevada?	18
Mr. Mossack and Mr. Fonseca or Mr. Fonseca acted on	17
Services Nevada, have there been other instances where	16
Q In your history working for MF Corporate	15
A No, I didn't ask.	14
Q You didn't ask anyone that question?	13
A No.	12
position with MF Corporate Services Nevada?	11
Q All right. Do you know if they have any	10
A No, I don't know.	9
Services Nevada?	ω
signed the employment contract on behalf of MF Corporate	7
So do you know why Mr. Mossack and Mr. Fonseca	6
Q Me too, especially in the winter.	5
water.	4
A Very, and I'm a beach person so and the warm	ω
Q They have nice beaches in Panama.	2
	Ë

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	₽	Nevada?
	2	A No, no. I don't have any document of corporate
	ω	formation, just only the Article of Organization and the
	4	initial list what I have in the office.
	υ	Q In the Articles of Organization, are Mr. Mossack
	0	or Mr. Fonseca identified in any capacity?
	7	A No.
	8	Q Their names appear nowhere?
	9	A No, nowhere.
	10	Q So strike that.
	11	What is your title at MF Corporate Services
	12	Nevada, if you have one?
,	13	A I'm a secretary of the director.
	14	THE REPORTER: Of the what?
	15	THE WITNESS: Secretary.
	16	THE INTERPRETER: "I'm a secretary of the director."
	17	BY MR. WOODS:
	18	Q Of the board?
	19	A Of the board; and also I'm running the office by
	20	myself, so
	21	(Through the interpreter) I'm the only
	22	administrator.
	23	(In English) And the only employee.
	24	(Through the interpreter) And the only
	25	employee.
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	(Through the interpreter) Just for the	25	I	
1	A Yes.	24		7
	Q Do you sign salary checks for anyone else?	23		
	A Yes, sir.	22	an have to odere	
	Q Do you sign your own salary checks?	21	(2000) BCD (BBD)	7
	A $$ I pay the payroll taxes and I pay the payroll.	20		
	Q You do, okay.	19		office by
	A Myself.	18	entre de la constante de la co	
	Q Who handles the payroll for MF Nevada?	17	- Control of the Cont	
	e, but I don't know anything if they have, no.	16 here,		rector."
	A No, no. I don't do anything on the payroll	15		
	Nevada had other employees?	14 MF		
	Q As secretary to the board, would you know if	13		
	A As far as I know, no.	12		
	Q Is that what you're saying?	11	000000000000000000000000000000000000000	rices
	A NO.	10		
	W?	9 know?		
	Q MF Nevada has no other employees as far as you	80		
	A Okay.	7		
	Q just to make it easier.	0		
	A Yeah, okay.	5		. Mossack
	ch I'm going to call "MF Nevada" if that's okay	4 which		
	Q So MF Nevada MF Corporate Services Nevada,	ω		and the
	A Okay.	2		orporate
	Q Let me start with the second part.	<u></u>		
		Page 26		Page 25

			100000000000000000000000000000000000000
25 A Yes.	2	A Yeah, yeah, I understand.	25
24 company into MF Nevada's bank account in 1	2	hard for the court reporter.	2'4
23 the collection company and then from the	2	conversation people interrupt each other, but in it's	23
22 Q Okay. So the money goes from Mo:	2	Q That's okay. The deposition is funny because in	22
21 Panama.	N	A Yeah, sorry.	21
20 A And deposit in the account of MF	2	Q If you would just let me finish.	20
19 Q I see.	₽	A Is in	19
18 A No, collect money from Mossack Fo	P	expenses	18
17 from clients?	Н	Q So the money to pay your salary and the other	17
16 Q Okay. So a collection company co	Ľ	call charge and we get the money every month.	16
15 Panama, to collect company to collect	P.	for MF it's not myself, but MF Nevada, like you	15
14 A We pay a collection company to do	H	work. So I have my wire transfer on the money I charge	14
13 Q I see. So who deposits the mone	Ь	deposit the money of our work, and that's the way it	13
12 month.	щ	send it to our client, Mossack Fonseca, and they need to	12
11 account and we reconcilliate the account	ы	one, a temp, we do a spreadsheet with our work and we	11
10 Panama, so they deposit the sales every m	Ы	A Every month myself or my secretary, if I use	10
9 A No. We MF Nevada have in a b	-	used to pay your salary and other expenses?	9
8 clients or did it come from Mossack Fonse		Q How does MF Nevada receive the money that is	89
7 moment ago to MF Nevada does the wire		A Yes.	7
6 Q Okay. But does the wire that yo		of MF Nevada?	0
5 for the service we provide for them.		Q So as far as you know, you're the only employee	ن. ن
4 A Come from the client. They pay I		A No, no.	4
3 right?	_	not sign salary checks for anybody else?	ω
2 expenses of MF Nevada comes from Mossack		Q So you sign your own salary checks, but you do	2
1 Q So the money to pay your salary		services, the services.	<u> </u>
Page 28	P	Page 27	

Page 28 1 Q So the money to pay your salary and the other 2 expenses of MF Nevada comes from Mossack Fonseca; is that 3 right? 4 A Come from the client. They pay Mossack Fonseca 5 for the service we provide for them. 6 Q Okay. But does the wire that you mentioned a 7 moment ago to MF Nevada does the wire come from the 8 clients or did it come from Mossack Fonseca? 9 A No. We MF Nevada have in a bank account in 10 Panama, so they deposit the sales every month to the same 11 account and we reconcilliate the account every end of the 12 month. 13 Q I see. So who deposits the money every month? 14 A We pay a collection company to do that in 15 Panama, to collect company to collect the money. 16 Q Okay. So a collection company collects money 17 from clients? 18 A No, collect money from Mossack Fonseca. 19 Q I see. 20 A And deposit in the account of MF Nevada in 21 Panama. 22 Q Okay. So the money goes from Mossack Fonseca to 23 the collection company and then from the collection 24 company into MF Nevada's bank account in Panama? 25 A Yes.	2	2	2	2	N	2		1			1			—	—											ъ
Q So the money to pay your salary and the othe enses of MF Nevada comes from Mossack Fonseca; is ht? A Come from the client. They pay Mossack Fons the service we provide for them. Q Okay. But does the wire that you mentioned ent ago to MF Nevada does the wire come from the ents or did it come from Mossack Fonseca? A No. We MF Nevada have in a bank account ama, so they deposit the sales every month to the ount and we reconcilliate the account every end of th. Q I see. So who deposits the money every month ama, to collect company to collect the money. Q Okay. So a collection company to do that in ama, to collect money from Mossack Fonseca. Q Okay. So a collection company collects mone m clients? A And deposit in the account of MF Nevada in ama. Q Okay. So the money goes from Mossack Fonsec collection company and then from the collection collection company into MF Nevada's bank account in Panama? A Yes.	U	4	ω	2	ш	0	9	σ	7	0	G	4	w	2	1	0	9	ω	7	9	U	4	ω	2	Н	age
		into MF Nevada's bank account in Panama	collection company and then from the	Okay. So the money goes from Mossack Fonseca	Panama.	And deposit in the account of MF Nevada	н	No, collect money from Mossack Fonsec	rom clients	Okay. So a collection company collects	to collect company to collect the	We pay a collection company to do that	I see. So who deposits the money every month	month.	ccount and we reconcilliate the account every end of	so they deposit the sales every month to the	No. We MF Nevada have in a bank account	or did it come from Mossack Fonseca	ago to MF Nevada does the wire come from	Okay. But does the wire that you mentioned	the service we provide for	Come from the client. They pay Mossack	right?	of MF Nevada comes from Mossack Fonseca; is	So the money to pay your salary and the othe	28

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report for me to send it to the president	25	Q So you never look at that?	25	
give all the expense for every month and	24	these document I send it to the accounting here.	24	
work for us when we started. He prepare	23	A Probably do, but I don't see that because all	23	
(In English) I give everything	22	who the collection service	22	
I'm not good at finances.	21	Q So the bank statements you receive don't reflect	21	
The job does not include the fin	20	the name.	20	
understood it.	19	list of the people we pay services, but I don't remember	19	
THE WITNESS: (Through the interprete	18	service. At this point I don't know. Probably is in the	18	
MR. WOODS: Yes, if you understand it	17	mail, but I don't I don't know the company. It's a	17	
A Oh, I didn't know he finished ta	16	statement. I get the bank statement every month on the	16	
Q You can answer the question.	15	of the balance in the money, yes, because I get my	15	
BY MR. HRANITZKY:	14	A No, I don't have any no. I have the record	14	
You can answer the question.	13	Q in Panama?	13	
You haven't laid a foundation about what	12	A No.	12	
mischaracterizes the mischaracterizes	11	account	11	
MR. WOODS: Object to that question.	10	Q So do you have access to the records of the bank	10	
finances of MF Nevada?	. 6	A Yes.	9	
responsibility as secretary is to be fami		Panama, yes?	8	
Q Do you understand that part of y	7	that deposits the money in MF Nevada's bank account in	7	
A Uh-huh.	6	Q But you said that it's the collection company	o	
MF Nevada with respect to certain matters	ъ	don't know the name of the collection company.	_U	
Q And you report to the board of d	4	collection company because it's a service we pay, but I	4	
A Uh-huh.	ω	A I don't know. I don't know the name of the	ω	
Q You're the secretary of MF Nevad	2	company?	2	
A No.	ъ	Q I mean what is the name of the collection	<u> </u>	
30	Page	Page 29		
]	

24 give all the expense for ev 25 report for me to send it to	3 work for us when we start	2 (In English) I	I'm not good at finances.	O The job does not	18 THE WITNESS: (Through 19 understood it.	17 MR. WOODS: Yes, if you	16 A Oh, I didn't know	15 Q You can answer the	14 BY MR. HRANITZKY:	13 You can answer the	12 You haven't laid a foundation	11 mischaracterizes the mis	10 MR. WOODS: Object to t	9 finances of MF Nevada?	8 responsibility as secretary	7 Q Do you understand	6 A Uh-huh.	5 MF Nevada with respect to c	4 Q And you report to	3 A Uh-huh.	2 Q You're the secretary	1 A No.	Page 30
r every month and she prepare the		I give everything to a CPA who		ot include the finances for MF.	ugh the interpreter) Yes, I	you understand it.	now he finished talking.	the question.		the question.	dation about what her duties are.	mischaracterizes what she said.	to that question. I think that		tary is to be familiar with the	and that part of your		to certain matters, yes?	to the board of directors of		retary of MF Nevada though; right?		

A I don't remember at this point.	25
Q What is Ms. Wilson's E-mail address?	24
A Yeah.	23
Q You send them by E-mail?	22
A I send it by E-mail.	21
u send it to	20 you
Q When you send documents to Imogene Wilson, do	19
office.	18 off:
ere it is, but I don't know if she work for Panama	17 where
A I don't know. The address is Panama office,	16
Mossack Fonseca?	15 Moss
Q In the Panama office? The Panama office of	14
A In Panama office.	13
Q And where is Imogene Wilson located?	12
A Yes.	11
Q Wilson?	10
A Imogene Wilson.	9
Q Imogene?	∞
A Mrs. Imogene Wilson.	7
s that?	6 was
${\tt Q}$ You mentioned the president of the company. Who	5
MR. HRANITZKY:	4 BY N
od.	3 good.
t and they ask me probably; but the moment, so far so	2 out
if something is an error or something, they will find	1 So :
: 22 23 34 44	

critical drive critical for portro critical to positional outpot	
at them and then you send them to somebody else. Is	5 look
you said that you receive them but you don't	24 0
Uh-huh.	3 A
statements for MF Nevada's bank account in Panama	22 state
Before when I was asking you about the bank	21 0
Uh-huh.	20 A
State?	19 of St.
The annual list provided to the Nevada Secretary	18 0
(Through the interpreter) Annual list.	.7
The annual list, the annual list.	16 A
What list are you	.5
les. In the list I believe she's the president.	14 articles.
In the list I believe. I don't know the	13 A
Incorporation?	2 Incor
And that appears in the Articles of	11 0
Yes. She's the person.	10 A
Incorporation of MF Nevada?	9 Incor
) Is that reflected in the Articles of	8 ₁
Uh-huh.	7 A
And she's the president of MF Nevada?	6 2
many E-mail address I send it to her.	5 many
I don't remember the E-mail address, no. I have	4 A
But you don't remember her E-mail address?	3
Probably once a month.	2 A
How often do you send E-mails to Miss Wilson?	1 0
	Page 32

WILL Confirm from OASIS DEDODTING SEDVICES 11 C 702 A76 A500	No. of Contraction
various people at your Nevada accountant and also	25
Q Okay. So you send the bank statements to	24
Panama, yes, someone.	23
A My accounting here and Mossack Fonseca in	22
at Mossack Fonseca or the accounting?	21
Q I see. So collections and bookkeeping, are they	20
for Sharples & Associates who is the bookkeeper for us.	19
collection, collection, bookkeeper, another person work	18
A They have the name of the company more	17
Q Who are those people?	16
they need to receive it.	15
remember how many they are, but they are a part of people	14
are part of the accounting or collection, but I don't	13
A I think it's more people in the E-mail. They	12
Q Do you send them to anybody else?	11
A Yes.	10
Q Are they based here in Nevada?	9
A And Associates.	8
Q Sharpless?	7
A Sharples & Associates.	<u>о</u>
Q Sharple?	U
A Sharples & Associates, Sharples & Associates.	44
Q You send them to the CPA. Who is the CPA?	ω
A The CPA.	2
that right?	н
rage 33	

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	A Uh-huh.	55	2	
right?	administrator, and you're the only employee; ri	24 adm		
only	re the secretary to the board, you're the	3 you'	2	
said	ition or positions are at MF Nevada and you	2 pos	2	
your	${\tt Q}$ So you said that I asked you what y	21		
S.M.C., S.	A Controller or something.	20		\prec
	Q I see.	19	100000000000000000000000000000000000000	
•	A Yeah, yeah, not person specific, yeah.	18	wonsole-th	
n?	Q I see. But it doesn't list any person?	_7	<u> </u>	
400000000000000000000000000000000000000	't yeah, I don't remember exactly, yeah.	l6 can't	Н	
ny. So I	A Yeah, or collection and another company.	15	ь	
	Q So it's like accounting@Mossack.com?	14		Ø
	exactly.	13 exa		
ber	e. You know, it's some so I don't remember	12 name		
s not the	the E-mail; and the E-mail, they are always	11 see		
use I only	A Well, the names I don't remember because	10		
	es:	9 names?		
their	Q I see. But you don't remember any of	8		
	accounting or something accounting.	7 acc		
r e	A They are different department. They's	0		
k Fonseca?	Q Okay. Who are those people at Mossack	5		
	A Yes.	4		
Žianovou.	t right?	3 that		
Fonseca; is	Q there's various people at Mossack I	2		
	A Yes.	1		
		Page 34	- A	ω
				١

	222,000,000,000	
collect our invoices.	25	
A The collection department we pay because they	24	
money?	23	
Q And who is responsible for transferring that	22	
A Yes.	21	
periodically?	20	
account in Panama to the bank account in Nevada	19	
Q I see. So is money transferred from the bank	18	
here. All the bank account, they're running here.	17	
A No. All our business coming in a bank account	16	
Nevada?	15	
Q or do they get paid out of an account here in	14	
A No.	13	
Panama	12	
Q Do payroll checks get paid out of the account in	11	
about more than here.	10	
A Yes, here in this place. I don't know anything	9	
Q I see. So you're in charge of the payroll?	ω	
payroll.	7	
A I don't know if she's employee. She's not in my	o	
MF Nevada?	ر ن	
Q You don't consider Imogene to be an employee of	4	
A Uh-huh.	ω	
who's the president of MF Nevada?	2	
Q But you mentioned before a woman named Imogene	<u> </u>	

an E- yment ing th o? ow exa know of th he-man	cause the sale and the payment, but when we have to pay an exthey go more straight to colle	request	
il to ask t an E-mail yment of th ing that ti o? know the n of that h E-mail of nvoices is something,	ause the sale and the payment ause the sale and the payment.		25
il to ask t an E-mail yment of th ing that tio? ov exactly know the n of that of that h E-mail of	because the sale and the payment	on ti	24
il to ask an E-mail yment of t ing that t o? ow exactly know the of that	Notherty I don t have to send	that:	23
il to ask an E-mail yment of t ing that t o? ow exactly know the of that	Normalli I don't bare to sond	A	22
il to ask an E-mail yment of t ing that t o? ov exactly know the of that	re?	nature?	21
ail to ask d an E-mail ayment of t ring that t to? t know the	Q But how often do you send E-mails	Ø	20
ail to ask t	. I can give you wrong name. I don't	name.	19
ail to ask d an E-mail ayment of t ring that t	I think it's a name I don't	A	18
ail to ask d an E-mail ayment of t ring that t	Q All right. And who is that?	Ø	17
ail to ask d an E-mail ayment of t ring that t	A To the collection department.	A	16
ail to ask d an E-mail ayment of t	Q And who do you send that E-mail	Ø	15
ail to ask d an E-mail	for the jobs that we have done	invoice	14
ail to ask	person of the collection asking for p	the p	13
ail to ask	(Through the interpreter) I send		12
ail to ask	A I send an E-mail	A	11
ail to ask	s be transferred?	funds	10
	its expenses, who do you call or E-mai	meet	9
needs funds to	oll in Nevada, you see that MF Nevada	payroll	ω
charge of	Q I see. So if, as the person in	Ø	7
	:	them.	6
get a bill from	The reason I know is because I	А	Uī
	Q I see. So when	Ø	4
speak with them.	or a private company. I never	Fonseca	ω
it's Mossack	I don't know. I don't know if	A	2
Mossack Fonseca?	The collection department at	r D	Н
		36	Page

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(Through the interpreter) Since	25	25 at Mossack Fonseca.	ì
A Since open the door in the morni	24	24 probably in Mossack Fonseca, but I don't know if they are	t.
with MF Nevada, your job responsibilities	23	23 A No. It's I don't know. I don't know. It's	
Q I see, okay. What are your resp	22	22 Fonseca or someplace else?	
when I can it's the person I speak in :	21	21 Q Is that accounting and collections at Mossack	
A Yeah. The only thing I know is	20	20 sure. I need to I	
E-mail?	19	19 Can be accounting, but I don't I'm not sure. I'm not	
Q Her proper name doesn't appear w	18	18 A Collection department or what is their name?	
department.	17	17 who do you send the E-mail to?	
A And I don't know her E-mail becau	16	16 Q Well, and I'm asking, when you send the E-mail,	
Q A woman.	15	15 BY MR. HRANITZKY:	
A A woman.	14	14 THE WITNESS: (In English) Or I send an E-mail.	
Q Is that a man or a woman?	13	13 whoever is there, whoever happens to answer the phone."	
A Jodeli.	12	12 THE INTERPRETER: "What happens is you speak to	
Q Jodeli?	11	11 THE REPORTER: Start again. I didn't understand you.	
how to spell it, Jodeli.	10	10 is you speak to different people	
of the person I been speaking, Jodeli. I	9	9 A (Through the interpreter) Okay. What happens	
name they call Jodeli. Jodeli, I think tl	∞	8 collection service?	
A I have the feeling I speak more	7	7 MF Nevada's account, you don't remember the name of that	
people that you speak to?	o	6 them periodically to see that funds get transferred to	
Q Okay. Do you recall the name of	У	5 responsible for and that you have to communicate with	
A Yeah, I call the Panama country,	4	4 service is one of the expenses of MF Nevada that you're	
country?	ω	3 Q But even though you said before that paying this	
people answer the phone, are you calling :	2	2 sometime take later, pay after 30 days.	
Q When you call, understanding that	1	1 the people they don't pay on time; like, you know,	
 	Page	Page 37	

25	24 A	23 with MF	22 0	21 when I c	20 A	19 E-mail?	18 0	17 department	16 A	15 0	14 A	13 0	12 A	11 0	10 how to s	9 of the p	8 name they call	7 A	6 people t	5	4 A	3 country?	2 people a	1 0	Page 38
(Through the interpreter) Since I open the door	Since open the door in the morning	Nevada, your job responsibilities?	I see, okay. What are your responsibilities	an it's the person I speak in the phone.	Yeah. The only thing I know is Jodeli, because		Her proper name doesn't appear when you send the	nt.	And I don't know her E-mail because it's in the	A woman.	A woman.	Is that a man or a woman?	Jodeli.	Jodeli?	spell it, Jodeli.	person I been speaking, Jodeli. I don't know even	y call Jodeli. Jodeli, I think that's the name	I have the feeling I speak more often with one	that you speak to?	Okay. Do you recall the name of any of the	Yeah, I call the Panama country, yeah.		answer the phone, are you calling to the Panama	When you call, understanding that different	

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compliance with Nevada law?	25
corporations that you're overseeing are in full	24
Q So you can make sure that all of the Nevada	23
A (Through the interpreter) Yes.	22
Q Nevada corporations?	21
A Governing.	20
Q Changes to the laws and regulations governing	19
A Yeah.	18
Q Just allow me to finish.	17
A Changes to the law and regulations.	16
in the laws and regulations	15
Q So when you refer to "changes," you mean changes	14
change so the business can run.	13
change. If a change has been made, I have to make a	12
(Through the interpreter) If there has been any	11
and learn about jurisdiction of Nevada.	10
and comply with the regulation for the office in Nevada	9
company, service of process for companies we're having	
(In English) We request, to incorporate	7
receive.	6
the Secretary of State of all the documents that we	У
office operations, bring all the documents in front of	4
(Through the interpreter) I'm in charge of the	ω
(In English) be in charge of all	2
in the morning	1
Fage 39	

ı																								-	
25	24	23	22	21	20	19	18	17	16	15	14	13	12	11	10	9	∞	7	0	ហ	4	ω	2	⊢	Page
informed of changes to Nevada Laws and complying with	You're generally responsible for staying	Uh-huh.	you arrange for service of process of documents.	documents with the Nevada Secretary of State, sometimes	manage the office operations, you handle filing of	responsibilities are to open the door in the morning, you	Q Okay. So you mentioned your job	what's going to change in order to prepare the document.	more important is to I need to inform Mossack Fonseca	time to prepare yourself and prepare your client. The	if there any change coming and they give you ahead of	A They provide some education and they advise you	functions?	Q And that organization provides some educational	registered agents association of the state of Nevada.	member of the associated agents of the state of Nevada,	(Through the interpreter) I participate as a	something is changed; and also	agent, so we get mail every week or every month if	(In English) We are a commercial registered	Secretary of State.	A (Through the interpreter) I'm involved with the	Q And how do you learn about those changes?	A Correct, correct.	3 40

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A I was I was	25
position in entities other than MF Nevada?	24
assistant secretary, deputy secretary, or some other	23
Q Is part of your job to hold the position of	22
BY MR. HRANITZKY:	21
THE INTERPRETER: Consulate.	20
THE REPORTER: Or by?	19
this country or by consulate.	18
because otherwise it's no way to legalize document in	17
specific document here when they need to legalize,	16
A They grant me a Power of Attorney to sign this	15
Attorney?	14
Q They authorize you by granting you a Power of	13
I act on behalf to sign it as nominee service.	12
legalized in Nevada, they authorize me and they put on	11
A If the client requests signature to have	10
behalf of various entities. Is that right?	9
you're granted Powers of Attorney to sign documents on	8
Q So if I understand correctly, in some instances	7
service.	0
legalize them in the state of Nevada, acting as a nominee	رن ن
some cases we must sign documents for the purpose to	42
service between Mossack Fonseca and MF Nevada that in	ω
A (Through the interpreter) Yes. We have a	N
those Nevada laws. Is there anything else?	L
Page 41	
	7

other corporations, nominee corporations, nominee services, with the purpose to accelerate the process an incorporation or a legalization, but not anymore. I'm not doing that anymore. Q On behalf of what entities did you perform to be at one time? A In the past I sign a document. I was sign aldyne. MR. HRANITZKY: A-1-d-y-n-e. You're going to heat that one a lot. THE WITNESS: Plascot. BY MR. HRANITZKY: Q Sorry. What was that? A Plascot? A Plascot? A Plascot? A Plascot. Q Plascot, P-1-a-s-c-o-t? A Uh-huh. Q Okay. Any others? A I don't remember any other ones, but normall they need some specific on that company, they mention
other corporations, nominee corporations, nominee services, with the purpose to accelerate the process an incorporation or a legalization, but not anymore, I'm not doing that anymore. Q On behalf of what entities did you perform t role at one time? A In the past I sign a document. I was sig for Aldyne. MR. HRANITZKY: A-1-d-y-n-e. You're going to hea that one a lot. THE WITNESS: Plascot. BY MR. HRANITZKY: Q Sorry. What was that? A Plascot. Q Plascot. Q Plascot? A I think I give you some paper in that. I do remember right now. You need to have Q Plascot, P-1-a-s-c-o-t? A Uh-huh. Q Okay. Any others? A I don't remember any other ones, but normall
other corporations, nominee corporations, nominee services, with the purpose to accelerate the process an incorporation or a legalization, but not anymore. I'm not doing that anymore. Q On behalf of what entities did you perform trole at one time? A In the past I sign a document. I was sign and the past I sign a document. I was sign and the past I sign and the past I was sign and the past I sign and the past I was sign and the past I was that one a lot. THE WITNESS: Plascot. BY MR. HRANITZKY: Q Sorry. What was that? A Plascot? A Plascot? A I think I give you some paper in that. I do remember right now. You need to have Q Plascot, P-1-a-s-c-o-t? A Uh-huh. Q Okay. Any others?
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other corporations, nominee corporations, nominee services, with the purpose to accelerate the process an incorporation or a legalization, but not anymore, I'm not doing that anymore. Q On behalf of what entities did you perform trole at one time? A In the past I sign a document. I was sign aldyne. MR. HRANITZKY: A-1-d-y-n-e. You're going to heathat one a lot. THE WITNESS: Plascot. BY MR. HRANITZKY: Q Sorry. What was that? A Plascot. Q Plascot? A I think I give you some paper in that. I do remember right now. You need to have
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other corporations, nominee corporations, nominee services, with the purpose to accelerate the process an incorporation or a legalization, but not anymore, I'm not doing that anymore. Q On behalf of what entities did you perform trole at one time? A In the past I sign a document. I was sign aldyne. MR. HRANITZKY: A-1-d-y-n-e. You're going to heathat one a lot. THE WITNESS: Plascot. Q Sorry. What was that? A Plascot. Q Plascot?
other corporations, nominee corporations, nominee services, with the purpose to accelerate the process an incorporation or a legalization, but not anymore, I'm not doing that anymore. Q On behalf of what entities did you perform trole at one time? A In the past I sign a document. I was sign and the services and the services are provided to the services and the services are provided to the services and the services are purposed to be a lot. THE WITNESS: Plascot. BY MR. HRANITZKY: Mat was that? Q Sorry. What was that?
other corporations, nominee corporations, nominee services, with the purpose to accelerate the process an incorporation or a legalization, but not anymore, I'm not doing that anymore. Q On behalf of what entities did you perform trole at one time? A In the past I sign a document. I was sign aldyne. MR. HRANITZKY: A-1-d-y-n-e. You're going to heathat one a lot. THE WITNESS: Plascot. By MR. HRANITZKY: What was that?
other corporations, nominee corporations, nominee services, with the purpose to accelerate the process an incorporation or a legalization, but not anymore, I'm not doing that anymore. Q On behalf of what entities did you perform trole at one time? A In the past I sign a document. I was sign and the sign and
other corporations, nominee corporations, nominee services, with the purpose to accelerate the process an incorporation or a legalization, but not anymore, I'm not doing that anymore. Q On behalf of what entities did you perform trole at one time? A In the past I sign a document. I was sign aldyne. MR. HRANITZKY: A-1-d-y-n-e. You're going to heat one a lot. THE WITNESS: Plascot.
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other corporations, nominee corporations, nominee services, with the purpose to accelerate the process an incorporation or a legalization, but not anymore, I'm not doing that anymore. Q On behalf of what entities did you perform trole at one time? A In the past I sign a document. I was sign aldyne. MR. HRANITZKY: A-1-d-y-n-e. You're going to hear
other corporations, nominee corporations, nominee services, with the purpose to accelerate the process an incorporation or a legalization, but not anymore, I'm not doing that anymore. Q On behalf of what entities did you perform trole at one time? A In the past I sign a document. I was sign for Aldyne.
other corporations, nominee corporations, nominee services, with the purpose to accelerate the process an incorporation or a legalization, but not anymore, I'm not doing that anymore. Q On behalf of what entities did you perform trole at one time? A In the past I sign a document. I was sign
other corporations, nominee corporations, nominee services, with the purpose to accelerate the process an incorporation or a legalization, but not anymore, I'm not doing that anymore. Q On behalf of what entities did you perform trole at one time?
other corporations, nominee corporations, nominee services, with the purpose to accelerate the process an incorporation or a legalization, but not anymore, I'm not doing that anymore. Q On behalf of what entities did you perform t
other corporations, nominee corporations, nominee services, with the purpose to accelerate the process an incorporation or a legalization, but not anymore, I'm not doing that anymore.
other corporations, nominee corporations, nominee services, with the purpose to accelerate the process an incorporation or a legalization, but not anymore,
other corporations, nominee corporations, nominee services, with the purpose to accelerate the process
other corporations, nominee corporations, nominee
2 have the position of assistant secretary to other with
1 (Through the interpreter) I was assigned to
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because I don't know who. That's the ir	25 I	25 ///	
A The client or Mossack Fonseca.	24	24 contract service they have in	
Q When you say "they," you mean M	23	23 document because this is part of the service, the	
A Uh-huh, for nominee services.	22	A Since the beginning they told me I need to sign	
Q They used Aldyne more often?	21	21 you become assistant secretary for Aldyne?	
often.	20 0	20	
three or four year because they use this	19 1	19 that is requested.	
A In the past was more often than	18	18 Mossack Fonseca, and Mossack Fonseca uses the service	
recollection, how often did that happen?	17	17 A (Through the interpreter) The customer request	
Q But approximately, to the best	16	16 to sign documents on behalf of Aldyne?	
A Depend how they need it.	15	15 that you be made assistant secretary to Aldyne in order	
Q How frequently?	14	14 Q All right. So it was the client that requested	
A Uh-huh, in the past, yeah.	13	13 the client.	
secretary to Aldyne?	12 :	12 A (Through the interpreter) Usually it comes from	
Q But you've signed documents as	11	11 Q So where does the request come from?	
A I don't remember. No, I don't	10	10 another one, they will sign it too.	
become assistant secretary to Aldyne?	9	9 the only one I am, I have to sign it; but if I have	
Q Did you have to sign any docume	∞	8 A They can sign, anybody in my office. Because	
have the document with me.	7]	7 Q I see. So but	
A I have no idea. I don't know k	0	6 It's part of the service we need to provide to them.	
Aldyne?	G	5 MF Corporate Service we need to provide the service.	
Q When did you become assistant s	4	4 A Well, Mossack Fonseca have agreement with	
BY MR. HRANITZKY:	ω	3 responsibility?	
THE INTERPRETER: "In some occasions	2	2 Q Okay. Who asked you to take on that	
THE REPORTER: In what?	Ь	1 but in the past I don't do it. I resign it.	
44	Page 4	Page 43	
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                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             9
                                                                                                                                              often.
                                                                                                                                                                         three or four year because they use this nominee more
because I don't know who. That's the instruction I
                                                                                                                                                                                                                                                                                                                                                                                   secretary to Aldyne?
                                                                                                                                                                                                                                                                                                                                                                                                                                                                        become assistant secretary to Aldyne?
                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  have the document with me.
                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          Aldyne?
                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    BY MR. HRANITZKY:
                                                                                                                                                                                                                                    recollection, how often did that happen?
                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              A
                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       Q When did you become assistant secretary to
                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 THE INTERPRETER:
                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             THE REPORTER: In what?
                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             I have no idea. I don't know because I never
                                                                                                                                                                                                                                                                                                                        How frequently?
                                                                                                                                                                                                                                                                                                                                                   Uh-huh, in the past, yeah.
                                                       When you say "they," you mean Mossack Fonseca?
                                                                                      Uh-huh, for nominee services.
                                                                                                                                                                                                        In the past was more often than in the last
                                                                                                                                                                                                                                                                 But approximately, to the best of your
                                                                                                                                                                                                                                                                                            Depend how they need it.
                                                                                                                                                                                                                                                                                                                                                                                                                                             I don't remember.
                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   Did you have to sign any document in order to
                             The client or Mossack Fonseca. I don't know
                                                                                                                  They used Aldyne more often?
                                                                                                                                                                                                                                                                                                                                                                                                               But you've signed documents as assistant
                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 "In some occasions."
                                                                                                                                                                                                                                                                                                                                                                                                                                          No, I don't remember.
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25 A No.		25 the break: You mentioned that MF Nevada has a bank	
24 Q But it's no	N	24 Q Okay. Just one follow-up question from before	
23 no, I don't know the	N	23 BY MR. HRANITZKY:	
22 A Probably is	N	22 MR. WOODS: That's fine.	
21 Q Is it a U.S	N	21 Q And that's okay with everybody?	
20 A No, not Par	N	20 A (Through the interpreter) Yes, I understand.	
19 Q Is it a Par	<u> </u>	19 Q So you understand that?	
18 don't remember at th	ы	18 use the videographer.	
17 A No. I reco		17 discussed over the break that we are no longer going to	
16 is?		16 MR. HRANITZKY: So, Miss Amunategui and Kent, we	
15 Q And yet you	ы	15 only:)	
14 A Once a mont	<u></u>	14 The following proceedings were recorded by stenography	
13 Q How often	<u> </u>	13 (At this time the video record was terminated.	
12 remember at this po:		12 (Brief recess taken.)	
11 in my front to see t		11 record at 9:47 a.m.	
10 A You ask me		10 the deposition of Patricia Amunategui. Going off the	
9 remember the name of	O COLOR DE	9 THE VIDEOGRAPHER: This is the end of tape No. 1 in	
8 Q You get the	a de la constanta de la consta	8 second so that the videographer can change the tape.	
7 A I don't kno		7 MR. HRANITZKY: Okay. Why don't we break for a	
6 Q What's the		6 Fonseca.	
5 A No. Corre		5 A Yes. All the document came from Mossack	
4 really study them;		4 Aldyne, those came from Mossack Fonseca?	
3 Q And you get		3 needed to sign documents as assistant secretary to	
2 A Uh-huh.	99800	2 Q But when you received instructions that you	
1 account in Panama.		1 receive. I have the instruction more often in the past.	
Page 46	ru	Page 45	
	7		

A No.	25
Q But it's not a Panama bank?	24
no, I don't know the name.	23
A Probably is a U.S. bank, but I'm not sure. So,	22
Q Is it a U.S. bank with a branch in Panama?	21
A No, not Panamanian.	20
Q Is it a Panamanian bank?	19
don't remember at this time the name of the bank.	18
A No. I recognize the color of the paper, but	17
15.2	16
Q And yet you don't have any idea what the bank	15
A Once a month.	14
Q How often do you get the bank statements?	13
remember at this point.	12
in my front to see the name. I don't know, no. I don't	11
A You ask me the name. I need to have the paper	10
remember the name of the bank?	9
Q You get the bank statements and you don't	8
A I don't know.	7
Q What's the name of the bank?	0
A No. Correct, yes.	υ
really study them; correct?	4
Q And you get the bank statements but you don't	ω
A Uh-huh.	2

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A Yes.	25	A No, not Spanish.	25	
agreed." Do you see that?	24	Q Is it a Spanish name?	24	
thereto and their professional advisors	23	A Probably. I don't know.	23	
shall not be made known to anyone other	22	Q Is it an English name?	22	
it reads, "The existence and substance o	21	reason I don't remember.	21	
Q Now, on the bottom of that page	20	A It's not a simple name, so probably that's the	20	
A Okay.	19	remember.	19	
Q Yes, the paragraph No. 4.	18	Q Okay. If you don't remember, you don't	18	
BY MR. HRANITZKY:	17	Panama, but it's not Bank of America.	17	
MR. WOODS: Right.	16	A I don't think they have Bank of America in	16	
A This one (indicating)?	15	Bank of America?	15	
Q Look at the second page of the	14	Q Bank of America, but the bank in Panama is not	14	
MR. HRANITZKY: Sure.	13	A Bank of America.	13	
page 4 or starts on one page and goes	12	what's the name?	12	
MR. WOODS: Part of the problem is i	11	How about the bank that you use here in Nevada;	11	
A I think I'm lost. I'm in the w	10	Q Well, I don't want you to give me a wrong name.	10	
agreed"?	9	BY MR. HRANITZKY:	9	
thereto and their professional advisors		you a wrong name.	8	
shall not be made known to anyone other	7	THE WITNESS: If I give you a name, probably I give	7	
reads, "The existence and substance of t		MR. WOODS: Is that a "no"?	6	
Do you see paragraph No. 4? Do you see	5	A (Shakes head.)	ر ت	
page of your Employment Agreement, which	4	have a clue what the name of the bank is?	4	
Q Okay. I'd like you to look now	ω	Q And you just as you sit here now, you don't	ω	
A No.	2	A Yes.	2	
Q So you don't think it's a Latin	—	Q But the account is in Panama?	1	
ge 48	Page	Page 47		

> <\))	2
agreed." Do you see that?	24
thereto and their professional advisors unless mutually	23
shall not be made known to anyone other than the parties	22
it reads, "The existence and substance of this agreement	21
Q Now, on the bottom of that page, that last line	20
A Okay.	19
Q Yes, the paragraph No. 4.	18
BY MR. HRANITZKY:	17
MR. WOODS: Right.	16
A This one (indicating)?	15
Q Look at the second page of the contract.	14
MR. HRANITZKY: Sure.	13
page $4\$ or starts on one page and goes to the next.	12
MR. WOODS: Part of the problem is it starts on	11
A I think I'm lost. I'm in the wrong page.	10
agreed"?	9
thereto and their professional advisors unless mutually	œ
shall not be made known to anyone other than the parties	7
reads, "The existence and substance of this agreement	0
Do you see paragraph No. 4? Do you see at the end it	5
page of your Employment Agreement, which is Exhibit 1.	4
Q Okay. I'd like you to look now at the second	ω
A No.	Ν
Q So you don't think it's a Latin American bank?	1
, c	ı

contract, but I was not aware of that, and I read the contract with my attorney before I provide it to him. Q So you asked an attorney to review this contract A Uh-huh. Q before you signed it; is that right? A Yes, before, like many years ago. Q Who was the attorney? A Was one professor I have at the UNIV and I asked him if he can that will be okay to sign this contract. He say it look like it's fine and, yes, I sign it. Q Who was that? A Mr. Richard Linstrom. Q Linstrom? A Linstrom, yes. Q L-i-n-s-t-ro-m?	2 2 2 2 2 2 2 2 2 2 2 3 2 3 2 3 2 3 2 3
tract, but I was not aware of that, and I read th tract with my attorney before I provide it to him Q So you asked an attorney to review this tract A Uh-huh. A Uh-huh. Q before you signed it; is that right? A Yes, before, like many years ago. Q Who was the attorney? A Was one professor I have at the UNIV and I if he can that will be okay to sign this cont say it look like it's fine and, yes, I sign it. Q Who was that? A Mr. Richard Linstrom. Q Linstrom? A Linstrom, yes.	21 22 23
tract, but I was not aware of that, and I read th tract with my attorney before I provide it to him Q So you asked an attorney to review this tract A Uh-huh. Q before you signed it; is that right? A Yes, before, like many years ago. Q Who was the attorney? A Was one professor I have at the UNLV and I if he can that will be okay to sign this cont say it look like it's fine and, yes, I sign it. Q Who was that? A Mr. Richard Linstrom.	21
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tract, but I was not aware of that, and I read th tract with my attorney before I provide it to him Q So you asked an attorney to review this tract A Uh-huh. Q before you signed it; is that right? A Yes, before, like many years ago. Q Who was the attorney? A Was one professor I have at the UNIV and I if he can that will be okay to sign this cont say it look like it's fine and, yes, I sign it. Q Who was that?	
tract, but I was not aware of that, and I read th tract with my attorney before I provide it to him Q So you asked an attorney to review this tract A Uh-huh. A Uh-huh. Q before you signed it; is that right? A Yes, before, like many years ago. Q Who was the attorney? A Was one professor I have at the UNIV and I if he can that will be okay to sign this cont say it look like it's fine and, yes, I sign it.	20
tract, but I was not aware of that, and I read th tract with my attorney before I provide it to him Q So you asked an attorney to review this tract A Uh-huh. Q before you signed it; is that right? A Yes, before, like many years ago. Q Who was the attorney? A Was one professor I have at the UNIV and I if he can that will be okay to sign this cont	19
with my attorney before I provide it to him So you asked an attorney to review this Uh-huh before you signed it; is that right? Yes, before, like many years ago. Who was the attorney? Was one professor I have at the UNIV and I	18
with my attorney before I provide it to I so you asked an attorney to review this Uh-huh. before you signed it; is that right? Yes, before, like many years ago. Who was the attorney?	17
with my attorney before I provide it to I so you asked an attorney to review this Uh-huh before you signed it; is that right? Yes, before, like many years ago.	16
with my attorney before I provide it to I so you asked an attorney to review this Uh-huh. before you signed it; is that right?	15
, but I was not aware of that, and I read with my attorney before I provide it to I So you asked an attorney to review this Uh-huh.	14
, but I was not aware of that, and I read with my attorney before I provide it to I So you asked an attorney to review this	13
, but I was not aware of that, and I read with my attorney before I provide it to B So you asked an attorney to review this	12
, but I was not aware of that, and I read with my attorney before I provide it to \boldsymbol{l}	11
but I was not aware of that, and I read	10
	9
A I was aware that they have some privacy on the	8
contract?	7
Q Were you aware that that provision was in this	6
A No.	σ
provision?	4
Q Before today, do you recall reading that	ω
A Yes.	2
Q Did I read that right?	Н

ever seeing the language that we just went through	25
ne, yeah. I sign it and I send it bac	23
A Yeah. They say that whatever the contra	22
Q And Mr. Linstrom thought that was fine?	21
A Uh-huh.	20
identify who would be signing on behalf of MF Nevada?	19
Q So the document you showed Mr. Linstrom didn't	18
A No.	17
Q No?	16
A No.	15
the signature lines.	14
${\tt Q}$ What I'm asking is if their names appeared	13
A Yes.	12
it to him before it was signed.	11
Q So but just to be clear, I understand you	10
document was ready.	9
A No, no, no. I only bring the draft before	
names on the signature line?	7
Q Did the draft have Mr. Mossack and Mr. Fonseca'	6
give me an advice is it okay to sign this contract	σ
A No. I only bring this as a draft and just	4
the contract on behalf of MF Nevada?	ω
into how Mr. Mossack or Mr. Fonseca had authority	2
Q I see. Do you know if Richard Linstrom inquired	Ь
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	000000000000000000000000000000000000000
Fonseca?	25
Q You've said that you don't work for Mossack	24
A Yeah.	23
whether well, let me strike that.	22
I asked whether you have an understanding about	21
Q No, I didn't ask that. I didn't say "work for."	20
A No, no. I never work for Mossack Fonseca.	19
you work sometimes with Mossack Fonseca?	18
whether you're prohibited from disclosing publicly that	17
Q Okay. Do you have an understanding about	16
A No. This is the first time I realize that.	15
you work for Mossack or work for MF Nevada?	14
you're prohibited from disclosing publicly the fact that	13
Q Do you have an understanding as to whether	12
A Oh.	11
${\tt Q}$ No. I'm asking a different question.	10
order, you need to disclose when they ask you.	9
A $$ I understand that if you have by the Court	ω
for MF Nevada?	7
okay for you to publicly disclose the fact that you work	<u>о</u>
Q Do you have an understanding about whether it's	5
A No.	4
Q is that right?	ω
A No.	2
bottom of paragraph 4	P
	_

A I never thought about it.	25
Q You've never thought about that?	24
A I hope so, yeah. I don't know.	23
Mossack Fonseca is a client that you work for sometimes?	22
Q Are you permitted to disclose the fact that	21
BY MR. HRANITZKY:	20
THE INTERPRETER: Say it again.	19
A Say that again.	18
for?	17
the fact that Mossack Fonseca is a client that you work	16
Q All right. But are you permitted to disclose	15
disclose anything.	14
decide don't work for them anymore, of course I can't	13
do. I have I mean I can't disclose that if I	12
A Oh, yes, yes, we have a confidentiality. Yes, I	11
work with Mossack Fonseca as a client confidential?	10
whether you have an obligation to keep the fact that you	9
Q Okay. Do you have an understanding about	- ∞
A As a client, yes.	7
Q Okay. So you do work with Mossack Fonseca?	6
client called Mossack Fonseca.	U
for this company, MF Corporate Services, and I work for a	4
A I don't know what to say. I feel like I work	ω
Q But you do work with Mossack Fonseca; correct?	2
A No, I don't.	1

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Q Okay, sorry. I'm sorry, I didn'	25	25 work." Do you see that?	
has specific instructions for the client :	24 h	24 direct and control all of the details of the employee's	
receive them from the department and the	23 I	23 Q But the contract says, "The employer shall	
(Through the interpreter) There	22	22 the instruction for my client what they need.	
A Yeah. I get the direction for t	21	21 A No, I don't give myself instructions, but I get	
Q Probably better to do it in Span:	20	20 Q So you give yourself instructions?	
because	19 b	19 responsible for all the thing I need to do.	
A Uh-huh. I get the direction for	18	18 A Myself. I mean I am my own boss. I am	
from; right?	17 f	17 of your work?	
Q Okay. And that's where you get .	16	16 Q So who directs and controls all of the details	
A Yes. That's the only company I	15	15 A Yes.	
that's what you're referring to by "Mossa	14 t	14 Q Okay. And the employer is MF Nevada; correct?	
Q So an entity called Mossack Fons	13	13 A Uh-huh.	
A Mossack Fonseca is the only thin	12	12 your Employment Agreement?	
Q Is that Mossack Fonseca & Compan	11	11 Q Is that consistent with your understanding of	
A (Nods head.)	10	10 A Uh-huh.	
Q And that's Mossack Fonseca?	9	9 you see that?	
to us.	8	8 respect to her work assignments, to the employer." Do	
clients. We have only one client. They	7 c	7 employee's work and the employee shall report, with	
A The only client we have. We don	0	6 shall direct and control all of the details of the	
instruction?	5 1	5 numbered 1, the final sentence it reads, "The employer	
Q So the clients communicate direct	4	4 Q So going back to the first page, the paragraph	
A From the client request.	ω	3 A No. I don't know.	
Q Okay. So where do the direction	2	2 you're supposed to keep that confidential?	
A Uh-huh.	₽	1 Q So you don't have any understanding of whether	
\d	Page 54	Page 53	
			1

1 A Uh-huh. 1 A Uh-huh. 2 Q Okay. So where do the directions come from? 3 A From the client request. 4 Q So the clients communicate directly to you their instruction? 6 A The only client we have. We don't have multiple of clients. We have only one client. They send instruction to us. 9 Q And that's Mossack Fonseca? 10 A (Nods head.) 11 Q Is that Mossack Fonseca & Company? 12 A Mossack Fonseca is the only thing I know. 13 Q So an entity called Mossack Fonseca & Co., 14 that's what you're referring to by "Mossack Fonseca"? 15 A Yes. That's the only company I know. 16 Q Okay. And that's where you get the directions 17 from; right? 18 A Uh-huh. I get the direction for the Nevada sale 19 because 20 Q Probably better to do it in Spanish. 21 A Yeah. I get the direction for the office (Through the interpreter) There's instructions. 23 I receive them from the department and the client, who	Q Okay, sorry. I'm sorry, I didn't understand	25
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A Uh-huh. Q Okay. So where do the directions come	From the client	ω
54 A	Okay. So where do the directions come	2
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Cryptophen Vicini Gullerija	25	Q The sales department?	25	
	24	A (Through the interpreter) Sales.	24	ŝ
вү м	23	one particular department within Mossack Fonseca?	23	
	22	Q So you're saying that your directions come from	22	
	21	person that I in contact.	21	
	20	company with this characteristic." That's the only	20	
	19	this name," "Please incorporate this," "A client need a	19	
	18	This person are in contact with me to give me, "Check	18	
Iris	17	two person, in one small department from Mossack Fonseca.	17	
alwa	16	(In English) They have assign to one person,	16	
	15	Nevada	15	
	14	customers that are going to buy the companies in	14	
	13	A (Through the interpreter) The people, the	13	
for	12	Q Try it in Spanish and if let me suggest	12	
dire	11	there are how do I explain department.	11	
	10	A The only person I'm in contact for instruction	10	
	9	Q I'm sorry. I don't understand the answer.	9	
		attend clients buy Nevada companies.	8	
for	7	A Only for one department. They specify and	7	
		anybody else?	0	
	رن ن	Q Do you get directions and instructions from	5	
	4	A (Nods head.)	4	
and	ω	Mossack Fonseca; correct?	ω	
	2	You get some directions and instructions from	N	
		that answer.	Н	
e 56	Page	Page 55		

ū	24	23	22	21	20	19	18	17	16	15	14	13	12	11	10	9	∞	7	9	G	4	ω	2	\vdash	·
A	Ю	BY MR.	THE	А	Ю	A	Ю	Iris Ve	always	A	Ø	A	for Ne	directions	Ю	A	Ø	for Ne	A	Ø	A	and in	Ю	A	
In Chile we have a lot of those. Everybody	It's a funny last name.	HRANITZKY:	INTERPRETER: V-e-r-g-a-r-a, Vergara.	Vergara.	Vergara?	Iris Vergara.	Like iris the flower?	Vergara.	the same, but right now it's one person they call	Can be they change it many times, so it's not	And who is that?	Oh, yes.	Nevada; is that right?	ions come from the Mossack Fonseca sales department	Okay. So all of your instructions and	Yeah.	The sales department for Nevada?	Nevada.	The sale department for the only product I sell,	at Mossack Fonseca?	Department.	instructions come from the sales department	So to try to sum it up, all of your directions	Yes.	

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	A MF Corporate Nevada.	25	Г
	Q But your employer is MF Nevada; right?	24	
	A No, I don't think so they're representatives.	23	
	correct?	22 c	
	Mossack Fonseca are representatives of MF Nevada;	21 M	
	Q So the people in the Nevada sales office at	20	
	A Uh-huh.	19	
	with MF Nevada and its representatives?	18 w	
	Q So you have all of your communications solely	17	
	A Yes.	16	
	your employment arrangement?	15 у	
	Q Is that consistent with your understanding of	14	
	A Uh-huh.	13	
	Q Do you see that?	12	
	A Oh, yeah, okay.	11	
	the employer and its representatives"?	10 t	
	you "shall have all of her communication solely with	۶ 6	
	reads, "It is understood that the employee" that's	8 it	
	Q Do you see towards the end after the semicolon	7	
	A Okay.	6	
	Q Yes.	U	
	A We still in the contract, no?	4	
	No. 8 in Exhibit 1.	ω	
	Q Okay. I'd like you to look now at paragraph	2	
	called Vergara.	1 0	*
	Page 57		
			7

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	etter with the option that I can get paid	me a l	they sent	25	
	never ask for it. There's some Christmas	No. I	А	24	
	bonus since you've worked for MF Nevada?	paid a b	getting	23	
	u ever spoken to Imogene Wilson about	Have you	Ю	22	
		Uh-huh.	А	21	
	Wilson?	Imogene	Ø	20	
	Wilson.	Imogene	А	19	
	t's Imogene?	And tha	ю	18	
	president of the company take the decision.	The pre	A	17	
	else make that decision?	somebody	or does	16	
	decide on whether to pay yourself a bonus	Do you	ю	15	Management () - 400
	sometimes.	Yeah, s	А	14	
	u ever been paid a bonus?	Have you	Ø	13	
		Uh-huh.	А	12	
	discretion"?	at its	employee	11	CONTRACTOR
	option to pay bonus compensations to the	tional	the addi	10	0908908090CVCB00
	You see it says, "The employer reserves	Yes. Y	ю	9	44170000000000000
	? The last one here?	Fifteen?	A	œ	o-ectivate occur
	Can you turn to paragraph 15.	Okay.	Ю	7	***************************************
torreside	MACCO-SCALAR AND	· ·	employees	0	
ann de etter grand die et	they are representatives. They're not	Maybe t	А	U	300 (CO) (CO) (CO)
	ves; right?	representatives	its repr	4	
	solely with the employer, MF Nevada, or		communications	ω	***************************************
	at you shall have all of your	says that	contract	2	
- Andrewson of the Control of the Co	And this provision in your employment	Right.	Ø	1	
	- Control Cont		58	Page	

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Page 60 1 Q And what did the other two people do? 2 A Work office help. When I'm very busy I can't do 3 all the document by myself. So they help to prepare 4 Article of Organization, Excel with invoices, and all the 5 other stuff, the office things we need. 6 Q So they did the same things that you do? 7 A Not all the same things but almost. They're 8 very well trained in almost the same but no signing of 9 course; but they help me in all the office things, answer 10 the phone and prepare stuff and I sign. 11 MR. HRANITZKY: You got the "pero" as a but. 12 THE WITNESS: Oh. 13 BY MR. HRANITZKY: You got the "pero" as a but. 14 Q The court reporter picked that one up. Believe 15 it or not, sometimes even I do that. 16 A Really? 17 Q Yeah. There's something about "pero" that just 18 slides right off the tongue. 19 A In the casino they call me Mrs. Pero because I 20 always say "pero." 21 MR. WOODS: Because it uses the same parts of your 22 mouth. 23 THE WITNESS: Yeah. 24 MR. HRANITZKY: "But" sort of gets in the way and 25 "pero" just sort of slides.	www.oasisreporting.com OASIS REPORTING SERVICES, LLC 702-476-4500	SO WWW	1500
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Page 60 1 Q And what did the other two people do? 2 A Work office help. When I'm very busy I can't 3 all the document by myself. So they help to prepare 4 Article of Organization, Excel with invoices, and all t 5 other stuff, the office things we need. 6 Q So they did the same things that you do? 7 A Not all the same things but almost. They're 8 very well trained in almost the same but no signing of 9 course; but they help me in all the office things, answ 10 the phone and prepare stuff and I sign. 11 MR. HRANITZKY: You got the "pero" as a but. 12 THE WITNESS: Oh.	MR.	13	MARCH CONTROL
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Page 60 1 Q And what did the other two people do? 2 A Work office help. When I'm very busy I can't 3 all the document by myself. So they help to prepare 4 Article of Organization, Excel with invoices, and all t 5 other stuff, the office things we need. 6 Q So they did the same things that you do? 7 A Not all the same things but almost. They're 8 very well trained in almost the same but no signing of 9 course; but they help me in all the office things, answ 10 the phone and prepare stuff and I sign.	HRANITZKY: You got the "pero" as a	11	were and the
Page 60 1 Q And what did the other two people do? 2 A Work office help. When I'm very busy I can't 3 all the document by myself. So they help to prepare 4 Article of Organization, Excel with invoices, and all t 5 other stuff, the office things we need. 6 Q So they did the same things that you do? 7 A Not all the same things but almost. They're 8 very well trained in almost the same but no signing of 9 course; but they help me in all the office things, answ	phone and prepare stuff and I	10	
Page 60 1 Q And what did the other two people do? 2 A Work office help. When I'm very busy I can't 3 all the document by myself. So they help to prepare 4 Article of Organization, Excel with invoices, and all t 5 other stuff, the office things we need. 6 Q So they did the same things that you do? 7 A Not all the same things but almost. They're 8 very well trained in almost the same but no signing of	but they help me in all the office things,	9	00-10020000
Page 60 1 Q And what did the other two people do? 2 A Work office help. When I'm very busy I can't 3 all the document by myself. So they help to prepare 4 Article of Organization, Excel with invoices, and all t 5 other stuff, the office things we need. 6 Q So they did the same things but almost. They're	trained in almost the same but no signing	- ∞	ON CONTRACTOR OF
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Page 60 1 Q And what did the other two people do? 2 A Work office help. When I'm very busy I can't 3 all the document by myself. So they help to prepare 4 Article of Organization, Excel with invoices, and all t	So they did the same things that you	6	******
Page 60 1 Q And what did the other two people do? 2 A Work office help. When I'm very busy I can't 3 all the document by myself. So they help to prepare 4 Article of Organization, Excel with invoices, and all t	stuff, the office things we	Сī	***************************************
Page 60 1 Q And what did the other two people do? 2 A Work office help. When I'm very busy I can't 3 all the document by myself. So they help to prepare	of Organization, Excel with invoices, and all	4	
Page 60 1 Q And what did the other two people do? 2 A Work office help. When I'm very busy I can't	l the document by myself. So they help to	ω	mucione
Page 60 1 Q And what did the other two people	Work office help. When I'm very busy I can't	2	
Page	And what did the other two people	₽	***************************************
	60	Page	59

4 3 2 1

BY MR. HRANITZKY:

THE WITNESS: Pero slides.

Page 61

Ø

Could you look now at paragraph 16.

That will be a good review of my contract.

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anymore, but	long time ago. Probably is not there	it's a	25
because	I don't remember who was at that time	A	24
	Who in the marketing department?	Ю	23
		have.	22
but I never	presentation; and they say will be an option, b	presen	21
of my	With the marketing department in one c	A	20
	Who did you discuss that with?	Ю	19
	Yes, but never happened.	А	18
	Being paid	Ю	17
	Yes.	A	16
	-	paid -	15
y of being	Have you ever discussed the possibility	Ø	14
	No.	A	13
	Never?	Ю	12
	No, and I'm very mad. No, never.	А	11
ation?	Do you ever receive commission compensation?	Ю	10
	Uh-huh.	A	9
	compensation?	compen	œ
ion	You see there's a reference to commission	Ю	7
	It's always good, yeah.	A	6
	It's always good to look at it again.	Ю	5

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24 person that I have contact with for	23 THE WITNESS: (Through the inter	22 THE REPORTER: I'm sorry. I did	21 A With the only person I get	20 Mossack Fonseca; right?	19 for each assigned project, you get i	18 Q Well, when you get the name	17 A I don't know.	16 Q But in practice that's the	15 A I don't know, but	14 Mossack Fonseca?	13 Q The "employer organization,"	12 A Uh-huh.	11 organization regarding each assigned	10 provided the name of a contact person	9 the second sentence. It reads, "The	8 Q All right. Could you look	7 A I believe so.	6 Q Are they based in Panama, t	5 A Yes.	4 Fonseca?	3 Q And that's the marketing de	2 happen.	1 I requested and they say, "Well, may	Page 62
or an assignment or job	nterpreter) The only	didn't understand that.	et			ame of a contact person		ne way it works; right?			on," does that refer to		ned project."	rson in the employer	The employee shall be	ok now at paragraph 19,		, that department?			department at Mossack		maybe," and it never	

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Q And the letter is signed Katia	25	5 whatever regarding sale.	25	
A Uh-huh.	24	1 please. Give me a name and ability," or whatever,	24	
letterhead? Do you see that?	23	who tell me, "This is the company we need. Check,	23	
Q on MF Corporate Services Nev	22	this point. I don't remember name, but she is the person	22	
A Uh-huh.	21	A Iris Vergara or whatever is replacing her at	21	
contract in Exhibit 1 there's a letter -	20	Q And Iris Vergara?	20	
Q Could I ask you you see afte	19) have daily is from the sale department.	19	
A Yes.	18	A No, no, no. The only contact and instruction I	18	
instructions would come from Iris Vergar	17	7 contact person at the client, do you?	17	
Q But the standard practice is th	16	So but you don't give yourself the name of the	16	
respond them.	15	nobody give me instructions how I do.	15	
Vergara or the person in charge at that	14	(In English) I manage the office. I don't have	14	
information first to me and I need to fo	13	The other instructions I have on my own by myself.	13	
they the time sometimes. They want t	12	need to be incorporated. You see what the client needs.	12	
don't remember, but if that happened, it	11	that I receive daily is preparations for companies that	11	
A Probably I will do one time in	10	(Through the interpreter) The only instruction	10	
places with requests for	9	A For all the incorporation, because	9	
Q So you never get E-mails from a		Vergara; correct?	ω	
and tell Iris give me the instruction.	7	7 contact persons for each assigned project from Iris	7	
instruction from them. So I need to tel		Q the contact you receive the names of	0	
something, but I need to I'm prohibit	ر ن	A In practice.	ъ	
A I probably get phone call from	-4	Q So that's in practice	4	
Switzerland?	ω	A Iris Vergara.	ω	
Fonseca's affiliates in Uruguay or in Pe	2	Q Iris Vergara?	2	
. Q Do you ever get requests from p		BY MR. HRANITZKY:	1	

A Uh-huh. Q And the letter is signed Katia Solano.	24
letterhead? Do you see that?	23
Q on MF Corporate Services Nevada Limited	22
A Uh-huh.	21
contract in Exhibit 1 there's a letter	20
Q Could I ask you you see after the employment	19
A Yes.	18
instructions would come from Iris Vergara?	17
Q But the standard practice is that the	16
respond them.	15
Vergara or the person in charge at that time. I can't	14
information first to me and I need to forward to Iris	13
they the time sometimes. They want to get the	12
don't remember, but if that happened, it's because	11
A Probably I will do one time in the past. I	10
places with requests for	9
Q So you never get E-mails from any of those	∞
and tell Iris give me the instruction.	7
instruction from them. So I need to tell them go back	0
something, but I need to I'm prohibited to accept	U
A I probably get phone call from them to reques	42
Switzerland?	ω
Fonseca's affiliates in Uruguay or in Peru or in	2
Q Do you ever get requests from people at Mossack	ъ
e 64	Page

Page 63

	240000000000000000000000000000000000000
A No, no idea.	25
Q Okay. Do you know who employed her?	24
A Maybe two or three time in my entire life.	23
Q How often?	22
A A couple time in my life, yes.	21
phone?	20
Q Did you ever speak with Katia Solano on the	19
A No. I can assume in Panama, but I don't know.	18
Q Do you know where Katia Solano was based?	17
A Uh-huh.	16
Q And one of those is human-resources support?	15
A Sometimes, yes.	14
services to MF Nevada?	13
Q So Mossack Fonseca provides some back-office	12
share some services with them, Mossack Fonseca.	11
A No, not here, but in the contract agreement we	10
department?	9
Q Does NF Nevada have a human resources	∞
A Uh-huh.	7
resources and the letter is on MF Nevada letterhead.	6
Q Well, it says on the letter she's in human	ъ
believe.	4
A Katia Solano was the person in human resource I	ω
Q Who is Katia Solano?	2
A Uh-huh.	ъ
# £ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$	

think so, yeah. er you were asking for a raise nts to your compensation packants to your compensation packants to your compensation packants. It. It. It. It. It. It. It.	h-huh. s that "ye es. ust for th to be dif o, no, no, er job is ou see in the partn the partn don't kno	A UI A Y A Y O D I O O O O O O O O O O O O O O O O O	11 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1
think so, yeah. er you were asking for a raise nts to your compensation packa nts to your compensation packa nefit of the court reporter. lt. h. lenging as is. next sentence it says, "Please response to the different response to the different rtners"?	h-huh. s that "ye es. ust for th to be dif o, no, no, o, see job is ou see in the partn ho are "th		11 11 11 11 11 11 11 11 11 11 11 11 11
think so, yeah. er you were asking for a raise nts to your compensation packants to your compensation packants. It. lt. lt. lenging as is. next sentence it says, "Please response to the different	h-huh. s that "ye es. ust for th to be dif to be dif o, no, no, er job is ou see in the partn		13 11 15 16 16 17 17 18 19 19 22 22 23
think so, yeah. er you were asking for a raise nts to your compensation packants to your compensation packants. It. h. lenging as is. next sentence it says, "Please response to the different	h-huh. s that "ye es. ust for th to be dif o, no, no, er job is ou see in the partn		22 1 1 1 1 1 1 1 2 2 2 1 1 9 1 8 1 7 6 1 8 1 8 1 8 1 8 1 8 1 8 1 8 1 8 1 8 1
think so, yeah. er you were asking for a raise nts to your compensation packants to your compensation packants. nefit of the court reporter. lt. h. lenging as is. next sentence it says, "Please response to the different	Uh-huh. Is that "ye Yes. Just for th ng to be dif No, no, no, Her job is You see in		13 13 14 15 16 17 17 18 19 20
ink so, yeah. you were asking for a raise to your compensation packa to f the court reporter. it of the court reporter. ging as is.	Uh-huh. Is that "ye Yes. Just for th ng to be dif No, no, no, her job is You see in		13 13 14 15 16 17 18 19
ink so, yeah. you were asking for a raise to your compensation packa to f the court reporter. ging as is.	Uh-huh. Is that "ye Yes. Just for th ng to be dif No, no, no, Her job is		13 13 14 15 16 17 18
ink so, yeah. you were asking for a to your compensation it of the court report	Uh-huh. Is that "yes" Yes. Just for the ng to be diffi		13 14 15 16 17
ink so, yeah. you were asking for a raise to your compensation packa to fthe court reporter.	Uh-huh. Is that "yes" Yes. Just for the		13 14 14 15 16
ink so, yeah. you were asking for a raise to your compensation packa	Uh-huh. Is that "yes" Yes. Just for the	0 A 0 A	13 13 15 16 16
ink so, yeah. you were asking for a to your compensation	Uh-huh. Is that Yes.	A Q A	13
ink so, yeah. you were asking for a to your compensation	Uh-huh. Is that	Q A	13
ink so, yeah. you were asking for a to your compensation		А	13
ink so, yeah. you were asking for a to your compensation	••	1	77
ink so, yeah. you were asking for a to your compensation		correct?	2
I think so, yeah. Itter you were asking for a	other improvements	and some	11
I think so, yeah.	And in the le	Ю	10
a terret ou out a tack	To her? Yes,	A	9
e a letter on July 1st. 2007?	Did you write	Ø	ω
	Yes.	A	7
letter dated July 1st, 2007"?	to "your	reference	6
n the very first paragraph there's a	Do you see in		σ
right.	Right there,	Ø	4
(indicating)?	There (indica	А	ω
	the letter	page of	2
d ask you to turn back to the first	So if I could	Ю	Н
		66	Page

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Page 67 Q You have no idea? A I don't know any idea. Q Do you think it's the partners of Mossack Fonseca? A No. I probably believe that's the partner of MF Corporate Services. Q Well, you're the secretary of MF Corporate Services; so if they had any partners, you would know about them, wouldn't you? A They have another company who is the but Timberlane Associates or something. Q Timberlane Associates. Q Timberlane Associates or something. A Timberlane Associates is all I remember. Q And you think the reference to "the partners" is the partners in Timberline Associates? A I think the partners of MF Corporate Services. Q But NR. WOODS: Me HANITZKY A Page 68 MR. HRANITZKY A WR. HRANITZKY B WR. HRANITZKY A WR. HRANITZKY B WR.	And that would be the	25		25	
Page 67 Q You have no idea? A I don't know any idea. Q Do you think it's the partners of Mossack Fonseca? A No. I probably believe that's the partner of G For I3 years, you're the secretary of MF Corporate Services: Q Well, you're the secretary of MF Corporate Services: A They have another company who is the shareholder. A They have another company? A I'm sorry, but I don't know exactly the name, but I'mberlane Associates or something. Q Timberlane Associates is all I remember. A Timberlane Associates? A Timberlane Associates is all I remember. Q And you think the reference to "the partners" is A I think the partners of MF Corporate Services. Q But When We'l, You're the Affanity to MF. HRANITZKY A We'l, I'm sorry, but I don't have so mething. I think the partners of MF Corporate Services. Q And you think the partners of MF Corporate Services. Q But When	Yeah,	24	she's said that she doesn't know what it means	24	
Page 67 No. I don't know any idea. Q Do you think it's the partners of Mossack Fonseca? A No. I probably believe that's the partner of MF Corporate Services. Q Nell, you're the secretary of MF Corporate Services: so if they had any partners, you would know about them, wouldn't you? A They have another company who is the shareholder. Q National Associates or something. Q Timberlane Associates or something. Q Timberlane Associates: Q And you think the partners of MF Corporate Services: A Timberlane Associates is all I remember. Q And you think the partners of MF Corporate Services: A Timberlane Associates? A Timberlane Associates is all I remember. Q And you think the partners of MF Corporate Services. A I think the partners of MF Corporate Services. A I think the partners of MF Corporate Services. A I think the partners of MF Corporate Services. A I think the partners of MF Corporate Services. A I think the partners of MF Corporate Services. A I think the partners of MF Corporate Services. A I think the partners of MF Corporate Services. A I think the partners of MF Corporate Services. A I think the partners of MF Corporate Services. A I think the partners of MF Corporate Services. A Yeah.		23	MR. WOODS: We're going to do an objection. I	23	
Page 67 No. I don't know any idea? Do you think it's the partners of Mossack Fonseca? A No. I probably believe that's the partner of McSack Fonseca: A No. I probably believe that's the partner of McSack Prosperate Services. Describes; so if they had any partners, you would know about them, wouldn't you? A They have another company who is the shareholder. Dut Timberlane Associates or something. A Timberlane Associates or something. Dut Timberlane Associates? A Timberlane Associates is all I remember. D And you think the partners of Mc Corporate Services. D And you think the partners of Mc Corporate Services. Page 68 RR. HRAMITZKY: And I'm challenging that. A WR. HRAMITZKY: I hear you. A WR. HRAMITZKY: I hear you. A WR. HRAMITZKY: I hear you. A WR. HRAMITZKY: And I'm challenging that. A WR. HRAMITZKY: And I'm challenging to continue to do that. A WR. HRAMITZKY: And I'm challenging to continue to do that. A WR. HRAMITZKY: And I'm challenging to continue to do that. A WR. HRAMITZKY: And I'm challenging to continue to do that. A WR. HRAMITZKY: And I'm continue to do that. A WR. HRAMITZKY: And I'm continue to do that. A WR. HRAMITZKY: And I'm continue to do that. A WR. HRAMITZKY: And I'm continue to do that. A WR. HRAMITZKY: And I'm continue to do that. A WR. HRAMITZKY: And I'm continue to do that. A WR. HRAMITZKY: And I'm continue to do that. A WR. HRAMITZKY: And I'm continue to do that. A WR. HRAMITZKY: And I'm continue to do that. A WR. HRAMITZKY: And I'm continue to do that. B So you're saying that. as secre A WR. HRAMITZKY: I hear you. A WR. HRAMITZKY: I hear you. B So you're saying that. as secre A WR. HRAMITZKY: I hear you. B So you're saying that, as secre A WR. HRAMITZKY: I hear you. B WR. HRAMITZKY: I hear you. B So you're saying that, as secre B WR. HRAMITZKY: I hear you. B So you're saying that, as secre B WR. HRAMITZKY: I hear you. B Well, the only reason I know the foorest in the office, where I have sere but you think the pertar of MF Corporate Services.		22	Ø	22	
Page 67 Q You have no idea? A I don't know any idea. Q Do you think it's the partners of Mossack Fonseca? A No. I probably believe that's the partner of MF Corporate Services; so if they had any partners, you would know about them, wouldn't you? A They have another company who is the shareholder. Q What is that company? A I'm sorry, but I don't know exactly the name, but Timberlane Associates or something. Q Timber? A Timberlane Associates is all I remember. Q And you think the reference to "the partners" is their vocabularry or they try to say. the partners in Timberlane Associates? Q And your make ro idea? A Timberlane Associates? Page 68 NMR. HRANITZKY: And I'm challenging to continue to do that. Q going to a MRR. WOODS: It's an objection. I made and some information in the gold who the government of MF Corporate Services; so if they was not the source of the partner in the sorry of the partner in the original that, as secre and the secretary of the government of MF Corporate in the spring that, as secre and the secretary of the partner in the secretary of MRR. WARLINITEXY: I hear you b	Solano meant shareholders	21	A I think the partners of	21	
Page 68 Q You have no idea? A I don't know any idea. Q Do you think it's the partners of Mossack Fonseca? A No. I probably believe that's the partner of MF Corporate Services, so if they had any partners, you would know about them, wouldn't you? A Timberlane Associates or something. Q Timberlane Associates is all I remember. Q And you think the reference to "the partners" is Page 68 R A I don't know any idea: 2 going to continue to do that. 2 going to continue to do that. 2 going to continue to do that. 3 MR. HRANITZKY: I hear you. 4 MR. HRANITZKY: I hear you. 5 Q So you're saying that, as secre 4 MR. HRANITZKY: I hear you. 6 For 13 years, you have no idea who the E 6 For 13 years, you have no idea who the E 7 MF Nevada are but you think they exist? 7 MF Nevada are but you think they exist? 8 A Well, the only reason I know it on the E but in the office, where I have shareholder. 10 not here but in the office, where I have shareholder. 11 Organization and some information who is but I don't have any other document. So Dartners are the shareholder. 12 but I don't have any other document. So Dartners are the shareholder. 13 partners are the shareholder. 14 Q But the word here is "partner." 15 "shareholder"; right? 16 A Weil, I will tell you, the Spartner of A Weil, I will tell you, the Spartner. 18 shareholder. Partner can be the couple.	Q So your	20	the partners in Timberline	20	
Page 67 Q You have no idea? A I don't know any idea. Q Do you think it's the partners of Mossack Fonseca? A No. I probably believe that's the partner of MF Corporate MF Corporate Services. Q Well, you're the secretary of MF Corporate Services; so if they had any partners, you would know about them, wouldn't you? A They have another company who is the shareholder. Q What is that company? A I'm sorry, but I don't know exactly the name, but Timberlane Associates or something. Q Timber? A Timberlane Associates is all I remember. Page 68 MR. HRANITZKY: And I'm challenging to continue to do that. Q G So you're saying that, as secre MF Corporate S Q So you're saying that, as secre MF Corporate A Mell, the only reason I know it here but in the office, where I have some document of MF Corporate Shareholder. 10 Organization and some information who is but I don't have any other document. So but I don't have are the shareholder. A Timberlane Associates or something. 11 Organization and some information who is shareholder. 12 Sut I don't have any other document. So will be a made of the couple. 13 Partners are the shareholder. 14 Q But the word here is "partner." 15 "shareholder"; right? A Timberlane Associates is all I remember.	their vocabulary	19	Q And you think the reference to "the partners"	19	
Page 68 Q You have no idea? A I don't know any idea. Q Do you think it's the partners of Mossack Peonseca? A No. I probably believe that's the partner of MF Corporate Services. Q Well, you're the secretary of MF Corporate Services; so if they had any partners, you would know about them, wouldn't you? A They have another company who is the shareholder. Q What is that company? A I'm sorry, but I don't know exactly the name, but Timberlane Associates or something. Q Timberlane Associates? Page 68 A MR. HRANITZKY: And I'm challenging 2 going to continue to do that. A MR. HRANITZKY: I hear you. A MR. HRANITZKY: And I'm sobjection. I me objection. I me objecti		18	A Timberlane Associates is all I	18	
Page 67 Q You have no idea? A I don't know any idea. Q Do you think it's the partners of Mossack Fonseca? A No. I probably believe that's the partner of MF Corporate Services. Q Well, you're the secretary of MF Corporate Services; so if they had any partners, you would know about them, wouldn't you? A They have another company who is the shareholder. Q What is that company? A I'm sorry, but I don't know exactly the name, Dut Timberlane Associates or something. A Timberlane Associates. Page 68 RR. HRANITZKY: And I'm challenging 1 MR. WRODS: It's an objection. I me 2 going to continue to do that. A MR. HRANITZKY: I hear you. A MR. HRANITZKY: And I'm challenging 2 going to continue to do that. A MR. HRANITZKY: And I'm challenging 2 going to continue to do that. A MR. HRANITZKY: And I'm challenging 2 going to continue to do that. A MR. HRANITZKY: And I'm challenging 2 going to continue to do that. A MR. HRANITZKY: And I'm challenging 2 going to continue to do that. A MR. HRANITZKY: And I'm challenging 2 going to continue to do that. A MR. HRANITZKY: And I'm challenging 2 going to continue to do that. A MR. HRANITZKY: And I'm challenging 2 going to continue to do that. A MR. HRANITZKY: And I'm challenging 2 going to continue to do that. A MR. HRANITZKY: And I'm challenging 2 going to continue to do that. A MR. HRANITZKY: And I'm challenging 2 going to continue to do that. A MR. HRANITZKY: And I'm challenging 2 going to continue to do that. A MR. HRANITZKY: And I'm sa objection. I me A MR. HRANITZKY: And I'm sa objection. I me B Going to continue to do that. A MR. HRANITZKY: And I'm sa objection. I me B G F O I S you're saying that, as secre A MR. HRANITZKY: I hear you. B G F O I S you're saying that, as secre A MR. HRANITZKY: I hear you. B G F O I S you're saying that, as secre B MR MR. HRANITZKY: I hear you. B MR. HRANITZKY: I hear you. B MR. HRANITZKY: I hear you. B G F O I S you're sayin	"partner"	17	Q Timberline	17	
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25	24	23	22	21	20	19	18	17	16	15	14	13	12	11	10	9	00	7	o	U	42	ω	8	1	Page
Q And that would be the shareholders in MF Nevada	A Yeah, that's what I think so.	Q when she used the word "partners"?	A Yeah.	Ms. Solano meant shareholders	Q So your understanding of this letter is that	their vocabulary or they try to say.	shareholder. Partner can be the couple. I understand	call "partner" everything. So partner can be the	A Well, I will tell you, the Spanish people, they	"shareholder"; right?	Q But the word here is "partner." It's not	partners are the shareholder.	but I don't have any other document. So I assume that	Organization and some information who is the shareholder,	not here but in the office, where I have the Article of	because I have some document of MF Corporate Services,	A Well, the only reason I know it's exist is	MF Nevada are but you think they exist?	for 13 years, you have no idea who the partners of	Q So you're saying that, as secretary of MF Nevada	MR. HRANITZKY: I hear you.	MR. WOODS: It's an objection. I made my objection.	going to continue to do that.	MR. HRANITZKY: And I'm challenging that and I'm	68

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Q I said, when you testified before	24	24 isn't it?	
A Say that again, please.	23	23 Q Well, if it's in a writing, that's a document,	
didn't mean that. Is that what you're sa	22	A No. They are in the writing, not in a document.	
document that lists the names of the share	21	21 yes?	
Q Okay. So when you said before th	20	20 Q And those names presumably are on a document,	
Never give it to me.	19	19 A But I have the name.	
everything was settled, so I don't have t	18	18 Q But you have the names?	
for this company after it was incorporated	17	17 documents. I don't have any bylaw of this company on me.	
in the little corporate kit I saw. And I	16	16 A I have the name, but I don't have any documents,	
about it. I know the name because that's	15	15 at the office?	
and lists who are the shareholders. I do	14	14 Q So do you or do you not have that document back	
It's a name with a document with a compan	13	13 A Uh-huh.	
A No, that document don't list any	12	12 Q Didn't you just say that?	
shareholders in MF Nevada?	11	11 A Yeah.	
Q And that document lists the name	10	10 shareholders in MF Nevada; right?	
the correct name.	9	9 document, not here but back in the office, that lists the	
Timberlane Associates. I don't remember		8 Q Well, you said a few minutes ago that you have a	
A With the name of the company I t	7	7 I don't know.	
Q And the names		6 document of that. So they probably refer to any party.	
A Somewhere, yeah.	Сī	5 A Whatever document they have. I don't have any	
back in your office?	44	4 Q Listed in the document?	
Q So there's a document with those	ω	3 believe they are not listed there.	
A No, no cassette tape.	2	2 A Not the Articles of Incorporation because I	
Q Unless it's on a cassette tape;	<u> </u>	1 listed in the Articles of Incorporation?	
9 70	Page	Page 69	
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A No, no cassette tape: right? A No, no cassette tape. Q So there's a document with those names back in your office? A Somewhere, yeah. Q And the names A With the name of the company I tell you Timberlane Associates. I don't remember even the correct name. Q And that document lists the names of the shareholders in MF Nevada? A No, that document with a company, that and lists who are the shareholders. I don't kno about it. I know the name because that's what the in the little corporate kit I saw. And I came the everything was settled, so I don't have that inf Never give it to me. Q Okay. So when you said before that you document that lists the names of the shareholder didn't mean that. Is that what you're saying? A Say that again, please. Q I said, when you testified before that a document back in the office that lists the		Page	70	
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5 a document back in the office that lists		24	I said, when you testified before that you	
		25	document back in the office that lists	

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A Probably was part of my job and I try to find	25
MF Nevada?	24
job as the secretary to the board of directors of	23
Q And you don't view that as being part of your	22
A Yes, I do.	21
Q But you're the secretary of MF Nevada?	20
A No, I don't know.	19
Q You don't know?	18
A I don't have no	17
Timberline?	16
Q Are there any other shareholders besides	15
company, I don't have no idea.	14
with who is the shareholder. If you ask me who own that	13
A Well, Timberlane is the only company I familiar	12
Timberline?	11
Q You said you only have one and you identified	10
that company.	9
A Yeah, but I have no idea who are the name of	8
Q That's Timberline?	7
know the name of the one, that one.	<u></u>
document with a list of the shareholders, never. I only	51
A Yeah, I change my answer. I never have a	4
Q You're changing your answer now?	ω
A Yeah, no.	2
shareholders, you didn't mean that?	
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25	24	23	22	21	20	19	18	17	16	15	14	13	12	11	10	9	œ	7	0	σ	4	ω	2	<u></u>	
covered b	ю	Mossfon.	I mean not	A	Retirement	ю	be in this	Panama for	and it was	A	International	Ø	A	Plan.	Ø	A	Ø	A	that we've	Ø	A	letter.	Ø	it, but t	
by the Mossfon International Retirement Plan?	I didn't ask you that. I asked you are you		ot with the rest of them, because I'm not part	But my plan is separate. It's a voluntary plan,	nt Plan?	So you're covered by the Mossfon International	s one.	or the other employee, and voluntary I choose	as not convenient, and they say they have some	Well, I try to find my 401K or something here	onal Retirement Plan?	So are you covered under the Mossfon	Uh-huh.		It refers to Mossfon International Retirement	Yeah.	You see paragraph 3?	Uh-huh.	7e been talking about.	Yes. It's the letter dated August 31st, 2007	Of this one?		Okay. Could you look at paragraph 3 of this	they never give it to me.	

A Yes, I receive my statements.	7
	24
documents	23
Q Do you receive any statements or other	22
plan different than the plan I have.	21
A I'm not sure because she called the retirement	20
Q You're not sure?	19
A Uh-huh.	18
Q Probably she's wrong?	17
A Probably she's wrong.	16
that right?	15
the same amount, you're saying that she's just wrong. Is	14
contribute 4 percent of your salary as long as you save	13
her very carefully written letter that Mossfon will	12
Q So where Ms. Solano from human resources says in	$\stackrel{\textstyle hickspace}{\scriptstyle hickspace}$
have to be in separate plan.	10
with a 4 percent. So I'm not employed with them, so I	9
international plan, but in myself, I'm in different plan	œ
probably offer the 4 percent of contribution to their	7
A I believe the letter is wrong because they	6
saying?	ហ
Q So this letter is wrong; is that what you're	4
They call different.	ω
They don't call Mossfon International Retirement Plan.	Ν
A I have a different plan of retire in Panama.	ш
I have a different plan of retire in Panama don't call Mossfon International Retirement Placall different. So this letter is wrong; is that what you's property of the letter is wrong because they also provided the letter is wrong because they have ably offer the 4 percent of contribution to the renational plan, but in myself, I'm in different	8 7 6 5 4 3 2 1

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Q But I'm not asking you that now. You already	25
plan.	24
A She's wrong about the name of the retirement	23
Q So you're saying she's wrong about that?	22
A No, yeah.	21
That's what you're saying?	20
Q But it's not Mossfon that contributes 4 percent?	19
is correct.	18
when I have different plan. The only thing is the amount	17
she mention the Mossfon International Retirement Plan	16
A She's probably wrong on this paragraph because	15
save the same amount, you're saying she's wrong?	14
will contribute 4 percent of your salary as long as you	13
Q So in this letter where Ms. Solano says Mossfon	12
4 percent.	11
A Mossfon MF Corporate Service pay the	10
4 percent; right?	9
Q But you give 4 percent and somebody else gives	- ∞
A From my check. I send it from my check.	7
from?	o
Q Well, do you know where the 4 percent comes	ъ
A Yeah. It's called different.	4
statement?	ω
Q Does it have sort of a name of a plan on the	2
A Yeah.	ы
74	Page

Page 75 1 said that. Now I'm asking who contributes the other 2 4 percent to the retirement plan. 3 A MF Corporate Service. 4 Q Okay. So when Ms. Solano says it's Mossfon that 5 contributes 4 percent 6 A It's wrong. 7 Q You're saying she's wrong? 8 A Yeah. 9 Q So Ms. Solano is wrong about a lot of things in 10 this letter. 11 A Yeah. Even the address of the letter is wrong 12 too. We don't have an office in Nevada in Reno, 13 Nevada, never. I never was in Reno, Nevada. 14 Q How did you get this letter? 15 A By E-mail. 16 Q Could you look at the last paragraph of the 17 letter. 18 A Uh-huh. 19 Q Do you see it says, "The partners are very 20 pleased with your performance and commitment and count on 21 your assistance for many years to come"? 22 A Uh-huh. 23 Q You're saying that you have no idea who those 24 partners are. Is that right? 25 A Yeah. I assume it's Timberlane.	www.	www.oasisreporting.com OASIS REPORTING SERVICES, LLC 702-476-4500	eo man	
Said that. Now I'm asking who contributes the other 4 percent to the retirement plan. A MF Corporate Service. Q Okay. So when Ms. Solano says it's Mossfon that contributes 4 percent A It's wrong. Q You're saying she's wrong? A Yeah. Q So Ms. Solano is wrong about a lot of things in this letter. A Yeah. Even the address of the letter is wrong too. We don't have an office in Nevada in Reno, Nevada, never. I never was in Reno, Nevada. Q How did you get this letter? A By E-mail. Q Could you look at the last paragraph of the letter. A Uh-huh. Q Do you see it says, "The partners are very pleased with your performance and commitment and count on your assistance for many years to come"? A Uh-huh. Q You're saying that you have no idea who those partners are. Is that right?	25	Yeah. I assume it's	25	
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Page 75 said that. Now I'm asking who contributes the other 4 percent to the retirement plan. A MF Corporate Service.	4	Okay. So when Ms. Solano says it's Mossfon	4	
Page 75 said that. Now I'm asking who contributes the other 4 percent to the retirement plan.	ω	MF Corporate	ω	
Page 75 said that. Now I'm asking who contributes the other	2	percent to the retirement	2	
75		aid that. Now I'm asking who contributes the	ы	
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you have you don't have a clue who they are?	25	S
Q And your fate is in their hands, as it were, but	24	
A Uh-huh.	23	er o oncorr
Q And they're pleased with your performance?	22	V/400485085
A Yes.	21	are realist
employment package?	20	OH.
Q And they're making the decisions about your	19	ANT PROTOS
A No, I don't know who they are.	18	A800276029
Q But you don't know who they are?	17	*******
performance on the work and they probably know.	16	NAME OF THE PARTY.
A They have I don't know. I do a good	15	-
they possibly know how you manage the company?	14	na come a processo o
Q Well, if you don't know who they are, how could	13	
BY MR. HRANITZKY:	12	
the company. That's what I believe it is.	11	****
THE WITNESS: Well, because they believe how I manage	10	economic de la constante de la
MR. WOODS: Objection; that's obviously speculation.	9	ם
with your performance and commitment?	8	30000000000000000000000000000000000000
${f Q}$ Then how could they possibly be very pleased	7	owere reasons
A No.		
Q Have you ever met anyone from Timberline?	ر ت	
A Uh-huh.	4	at
assistance for many years to come?	ω	HOLD BELLEVIO
with your performance and commitment and counts on your	2	
Q You think that it's Timberline is very pleased	₽	
9 76	Page	75

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THE WITNESS: (Through the interprete	25	So and I learn that their job they do and it's	25	
THE REPORTER: I didn't understand yo	24	they're very good attorneys when I go for my meeting.	24	
A Yeah, and 25 and 26 before we go	23	A Well, I know other people there and I know	23	
Q There were two others in 2011 and	22	2 right?	22	
A At the moment.	21	though you don't really know who the people are; is that	21	
know about?	20	Q All right. But you don't believe them even	20	
you're currently the only employee of MF l	19	say.	19	
Q And one other question: You said	18	and maybe I sometimes have to believe half of what they	18	
A Uh-huh.	17	A Yeah. I read many allegations about everything	17	
Q Not long before you started there	16	5 in the news, have you not?	16	
A Probably May 2000 or 2001. I'm	15	O Okay. Well, but you've read those allegations	15	
Q Do you know when MF Nevada was c	14	1 know, laundering money.	14	
A Okay.	13	firm. So I really don't believe they are in any you	13	
Q No, you don't have to go back.	12	client, I checked them and was a very prestigious law	12	
A So go back to the same paper?	H H	hired for this work and they told me who will be the	11	
before the break and then	10) get some information about it; but when I decide to get	10	
Q Just a couple of quick follow-up	9	A I don't read the newspaper for foreign, but I	9	
BY MR. HRANITZKY:	8	activities?	8	
Reporter.)	7	Mossack Fonseca being involved in money-laundering	7	
marked for identification by the Certifie	<u></u>	O Do you ever read in the newspaper reports about	0	
(Plaintiff's Exhibits 2, 3, 4, 6	ъ	are.	ر ت	
(Brief recess taken.)	4	A Many times, yeah, I wish I know them, where they	4	
MR. HRANITZKY: Why don't we take a b	ω	3 Q Does that make you uncomfortable at all?	ω	
choose a client.	2	2 meet them.	2	
completely against to that, so they're ve	1	A No. I don't know where they are and I never	₽	
78	Page	Page 77		

	20000		
5 A I don't remember. 2009 maybe.	25	Do you recognize Exhibit 2?	25
4 Q But you think it was about 2009?	24	order.	24
3 A Yeah. I keep it.	23	you have them out of order. You may have them out of	23
2 Q It's a good picture.	22	the document that's been marked as Exhibit 2. I think	22
1 special place to take the picture.	21	Q All right. So I'd like you to take a look at	21
0 A No. They take my picture. I ha	20	A Yeah, that was for a short time, yeah.	20
9 give them a picture?	19	Q And that was for a short time?	19
8 Q Did they take the picture for th	18	boss.	18
7 A May 2010 or 2009. I don't remem	17	A At the very beginning, yeah, she was my direct	17
6 Q Okay. When was that?	16	Q At the very beginning?	16
5 lot of these thing, they're not true.	15	A Yeah, I believe Nancy.	15
4 long time ago; and I give a little bit of	14	to you at MF Nevada.	14
3 believe. I don't remember many detail be	13	Q Yes, another MF Nevada employee who was senior	13
2 I speak with different two people in t	12	to report to another MF Nevada employee?	12
1 A Uh-huh, and I say yes and I'm gl	11	A (Through the interpreter) That I would have had	11
O Q The paralegal program at UNLV?	10	another employee at MF Nevada?	10
9 story in order to promote paralegal cours		Q Was there ever a time when you reported to	9
8 A Yes. They call me if I can help		the question. Sorry.	∞
7 before it was released?		A (Through the interpreter) Can you please repeat	7
6 Q Did you speak to UNLV about this		someone at MF Nevada who was an employee of MF Nevada?	Ø
5 UNIV.		Q Was there ever a time where you reported to	U
4 A No. I see this document was in		A The same. They are assistant, like a clerk.	4
3 document?		Q All right. And what did those employees do?	ω
2 Other than your picture, you've		(In English) I have we have more employees.	Ν
1 A I recognize my picture.		or '6, that I don't recall.	1
Page 80	70	Page 79	

25	24	23	22	21	20	19	18	17	16	15	14	13	12	11	10	9	ω	7	0	Сī	4	ω	2	1	Page
A I don't remember. 2009 maybe. I don't	Q But you think it was about 2009?	A Yeah. I keep it.	Q It's a good picture.	special place to take the picture.	A No. They take my picture. I have to go to a	give them a picture?	Q Did they take the picture for this or did you	A May 2010 or 2009. I don't remember.	Q Okay. When was that?	lot of these thing, they're not true.	long time ago; and I give a little bit of my story, but a	believe. I don't remember many detail because that's	I speak with different two people in the phone I	A Uh-huh, and I say yes and I'm glad to do it, so	${\tt Q}$ The paralegal program at UNLV?	story in order to promote paralegal course.	A Yes. They call me if I can help them to give my	before it was released?	Q Did you speak to UNIV about this advertisement	UNLV.	A No. I see this document was in magazine at	document?	Q Other than your picture, you've never seen this	A I recognize my picture.	80

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had ever seen it referred to that way.	25	Q You've never seen MF Nevada referred to as the	25	
Q I didn't ask you if you do. I	24	very prestigious law, Mossack Fonseca International.	24	
BY MR. HRANITZKY:	23	vice president at that time and I provide service for a	23	
question.	22	Ponseca. I worked for MF Corporate Services when I was	22	
MR. WOODS: Just make sure you're an	21	I'm a secretary. And also, I didn't work for Mossack	21	
A I don't refer Nevada office of	20) MF Corporate Services; I was at that time, because now	20	
Q You've never heard it referred	19	A Okay. The vice president and vice president for	19	
A Not from me.	18	mistaken?	18	
referred to as the Nevada office of Moss	17	Q So what in this advertisement do you believe is	17	
asking you whether you've heard ever	16	s exactly, but here is not right.	16	
Q Okay. I'm asking you something	15	service for Mossack Fonseca maybe. I don't remember	15	
A That's very wrong.	14	I was working for MF Corporate Services and I provide	14	
refers to Mossfon Nevada and you say tha	13	A Maybe. I don't remember, but I mentioned there	13	
The letter in Exhibit 1 dated A	12	this advertisement, did you mention Mossack Fonseca?	12	
different.	11	Q Well, when you spoke to the people who prepared	11	
Let's put it back in order. I'm asking	10) No, I didn't.	10	
Q I'm asking something different.	9) thought it was something personal of myself and I don't.	9	
mistake.	- ∞	A No, no, I never discuss with them because I	ω	
A They call Mossfon Nevada. Well	7	7 Q said yes?	7	
Q At the end, the letter	0	A No.	<u>о</u>	
A Talking about this.	5	Fonseca before you	G	
Q You're talking about Exhibit 1?	4	to agree to this advertisement with anyone at Mossack	4	
they calling	ω	Q Did you discuss the fact that you had been asked	ω	
A If you see my letter before, yo	2	I remember being very busy around that time.	2	
Nevada office of Mossack Fonseca?	<u> </u>	remember. Was like around Christmastime probably because	Н	
8 82	Page	Page 81		

Nevada office of Mossack Fonseca? A If you see my letter before, you see they calling Q You're talking about Exhibit 1? A Talking about this. Q At the end, the letter A They call Mossfon Nevada. Well, it's a big mistake. Q I'm asking something different. I see that. Let's put it back in order. I'm asking something different. The letter in Exhibit 1 dated August 31, 200 refers to Mossfon Nevada and you say that's wrong? A That's very wrong. Q Okay. I'm asking you something different. asking you whether you've heard ever heard MF Neva asking you whether you've heard ever heard MF Neva asking you whether heard it referred to that way? A Not from me. Q You've never heard it referred to that way? A I don't refer Nevada office of Mossack Fonseca? A I don't refer Nevada office of Mossack Fonse MR. WOODS: Just make sure you're answering the question. By MR. HRANITZKY: O I didn't ask you if you do. I asked you if	ver seen it referred to that way.	25
Nevada office of Mossack Fonseca? A If you see my letter before, you see they calling Q You're talking about Exhibit 1? A Talking about this. Q At the end, the letter A They call Mossfon Nevada. Well, it's a big mistake. Q I'm asking something different. I see that. Let's put it back in order. I'm asking something different. The letter in Exhibit 1 dated August 31, 200 refers to Mossfon Nevada and you say that's wrong? A That's very wrong. Q Okay. I'm asking you something different. asking you whether you've heard ever heard MF Neva referred to as the Nevada office of Mossack Fonseca? A Not from me. Q You've never heard it referred to that way? A I don't refer Nevada office of Mossack Fonse MR. WOODS: Just make sure you're answering the question.	Ø	24
Nevada office of Mossack Fonseca? A If you see my letter before, you see they calling Q You're talking about Exhibit 1? A Talking about this. Q At the end, the letter A They call Mossfon Nevada. Well, it's a big mistake. Q I'm asking something different. I see that. Let's put it back in order. I'm asking something different. The letter in Exhibit 1 dated August 31, 200 refers to Mossfon Nevada and you say that's wrong? A That's very wrong. Q Okay. I'm asking you something different. asking you whether you've heard ever heard MF Nevareferred to as the Nevada office of Mossack Fonseca? A Not from me. Q You've never heard it referred to that way? A I don't refer Nevada office of Mossack Fonseca? A I don't refer Nevada office of Mossack Fonseca?	estio	2 2 2
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age 82 Nevada office of Mossack Fonseca	If you see my letter before, you s	2
age	office of Mossack Fonseca	Н
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3 2 1

So you don't recall ever seeing that?

attention.
Q S

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Not

that I can remember, nor can I pay

Page 83

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and treasur	25		25 Q Were you vice president when you started at	
Secretary o	24	nous es pe Robe	24 A I need to check.	
remember wh	23	erjet, jejt, jezepte	23 Q You don't remember?	
and she put	22		22 A Maybe.	
Nancy, she	21		21 2001 to the time that this advertisement came out?	
A Wa	20		20 Q Had you been vice president all the way from	
president?	19	odyn (filologica) y Cod	19 president of MF Corporate Service Nevada.	
Q An	18	a a present to Leve Agil Little	18 changed after that. You know, at that time I was vice	
A Ye	17		17 A Yeah. So probably at that time probably I	
Q Ma	16	1940 10 11 11 11 11 11 11 11 11 11 11 11 11	16 advertisement dates from around 2009?	
A Ye	15		15 Q All right. But you said this letter or this	
Q An	14		14 like to be a vice president of anything, so I changed.	
A Uh	13	Ċ	13 because probably in the next renewal I changed. I don't	
vice presid	12		12 A Don't remember. For a short period of time	
Q So	11	the state of the	11 Q How long were you vice president?	
A No	10		10 A Uh-huh, secretary and vice president.	
Q Di	9		9 of MF Nevada?	
A Ye	ω	CT.	8 Q You said that you used to be the vice president	
same time?	7	100000000000000000000000000000000000000	7 A I am, but no.	
Q We	0		6 secretary of MF Nevada?	
A Pr	ъ		5 Q You don't pay attention even though you're the	
advertiseme	4	en e	4 A Well, I don't pay attention probably, no.	

ww.oasisreporting.com OASIS REPORTING SERVICES, LLC Electronically signed by Ellen Goldstein (001-341-578-7457)

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                      Secretary of State only asks you for secretary, president
                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    MF Nevada?
and treasurer.
                                               remember when -- I decide it was too much title.
                                                                       and she put that title; and then I decide -- I don't
                                                                                             Nancy, she file the document with the Secretary of State
                                                                                                                                                president?
                                                                                                                                                                                                                                                                                                                        vice president?
                                                                                                                                                                                                                                                                                                                                                                                                                                                  same time?
                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            advertisement came out?
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                                                                                                                       Was not my decision, but the person hire me,
                                                                                                                                                                                                                                                                                                Uh-huh, yes.
                                                                                                                                                                                                                                                                                                                                                                                                                          Yes.
                                                                                                                                                                                                                                                                                                                                                                                                                                                                          Were you vice president and secretary at the
                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            Yes.
                                                                                                                                                                        And it was your decision to stop being vice
                                                                                                                                                                                                                         Manager and secretary?
                                                                                                                                                                                                                                                                                                                                                                                                 Did you have any other titles?
                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   And you were vice president when this
                                                                                                                                                                                                                                                                         And now you have two titles?
                                                                                                                                                                                                                                                                                                                                                 So you had three titles, manager, secretary and
                                                                                                                                                                                                                                                                                                                                                                         No. Just manager like I do now.
                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   Probably. I don't know, yeah.
Why I want to
use two titles?
Even I
                                                 The
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ACTIVITY OF THE ACTIVITY OF TH	281100000000000000000000000000000000000
A No. I have to sign it, but I informed them.	25
Q or you just did it?	24
A No, no.	23
Q Did anyone else have to sign off	22
A And I did it, yeah.	21
Q And then you just did it?	20
some change.	19
A Yeah. Probably I informed him I want to make	18
of MF Nevada?	17
Q So you probably discussed it with the president	16
change it."	15
not needed. And at that time told me, "Yes, go ahead,	14
to have two title. In the Secretary of State file it's	13
president at the time and $\ensuremath{\mathrm{I}}$ told him this look ridiculous	12
A Don't remember that time. Probably with the	11
Q Who did you discuss that with?	10
A Yeah.	9
many titles and you wanted a shorter title?	00
Q And it was as simple as that. You just had too	7
A Yes.	9
Q to stop being vice president?	U
A My decision.	4
Q But it was your decision	ω
secretary.	2
don't have space to put it in, so I decide to choose for	<u> </u>
! !	

Page 86 1 Q Okay. Could you look now at the document that's 2 been marked as Exhibit 3. 3 Sorry. One last question about Exhibit 2. 4 A Uh-huh. 5 Q Have you ever discussed this advertisement with 6 anyone at Mossack Fonseca? 7 A No. No, I didn't. How would be any related? I 8 thought, you know, they're going to use I tried to 9 call in and correct that but say it's not that important. 10 Q But as far as you know, does anyone at Mossack 11 Fonseca even know about that advertisement? 12 A Probably not. 13 Q Did you ever consider that mentioning Mossack 14 Fonseca in an advertisement like that might have been a 15 breach of paragraph 4 of your employment contract? 16 MR. WOODS: I'm going to object. She testified 17 earlier she didn't know about the employment contract. 18 THE WITNESS: I didn't pay attention probably. I 19 don't thought it was necessary, but 20 BY MR. HRANITZKY: 21 Q Okay. So Exhibit 3, Exhibit 3 is an E-mail from 22 you to "Nevada office MF" dated January 17, 2014; is that 23 right? 24 A Can I ask you, when you refer to "MF," is	702-476-4500 dc74e275-4a77-447e-be82-fc4e6d92d860	www.oasisreporting.com OASIS REPORTING SERVICES, LLC 702-476-4500 Electronically signed by Ellen Goldstein (001-341-678-7457) dc74c275-4a77-447e	www.oas
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mfcorpserv.com, but it's us two.	25	They mean MF Corporate Services Nevada. That's	
A I have another E-mail address with the	24	24 pamunategui@mfcorpserv.com.	
world	23	23 A Myself, because I use	
Q Those are the only two E-mail addresses in the	22	22 name?	
A No.	21	21 Q Does anyone other than MF Nevada use that domain	
mfcorpserv.com domain name?	20	20 A Yes.	
Nevada@mfcorpserv.com that has an E-mail address with t	19	19 MF Nevada; right?	
Q Is there anyone besides you and then this	18	18 Q So mfcorpserv.com is the domain name for	
A Nobody else.	17	17 A Yes. That's our domain name.	
Q Nobody else?	16	16 Q Do you see that?	
A Me and her.	15	15 A Uh-huh.	
E-mail that goes to Nevada@mfcorpserv.com?	14	14 Nevada@mfcorpserv.com.	
Who besides you and your secretary has access	13	13 Q Okay. Then next to it is an E-mail address,	
${ t Q}$ Let me ask the question again.	12	12 A Uh-huh.	
outgoing E-mails?	11	11 right?	
A (Through the interpreter) Incoming E-mails or	10	10 Q Okay. But the document says "Nevada office MF";	
E-mail that comes in to Nevada@mfcorpserv.com?	9	9 A Well, this is our domain name.	
Q Who besides you and your secretary can see	- ∞	8 "Nevada office MF."	
E-mail.	7	7 Q It doesn't say "MF Corporate Services." It says	
it, and difference of the other one what is my personal	6	6 A MF Corporate Services.	
Service Nevada. My secretary can see it and I can see	О	5 Q Right?	
A It's the general E-mail from MF Corporate	42	4 A Yeah.	
Whose E-mail address is that?	ω	3 Q It says "Nevada office MF."	
Q So who is Nevada@mfcorpserv.com? Who is that:	2	2 A Nevada office MF Corporate Services, yeah.	
just a short name of the company and the domain name.		1 Q I'm reading from the top of the document itself.	
e 88	Page	Page 87	
			7

3 Whose E-mail address is that? 4 A It's the general E-mail from MF Corporate 5 Service Nevada. My secretary can see it and I can see 6 it, and difference of the other one what is my personal 7 E-mail. 8 Q Who besides you and your secretary can see 9 E-mail that comes in to Nevada@mfcorpserv.com? 10 A (Through the interpreter) Incoming E-mails or 11 outgoing E-mails? 12 Q Let me ask the question again. 13 Who besides you and your secretary has access to 14 E-mail that goes to Nevada@mfcorpserv.com? 15 A Me and her. 16 Q Nobody else? 17 A Nobody else? 18 Q Is there anyone besides you and then this 19 Nevada@mfcorpserv.com that has an E-mail address with the 20 mfcorpserv.com domain name? 21 A No. 22 Q Those are the only two E-mail addresses in the 23 world 24 A I have another E-mail address with the	L	ß				in											`."			уs				
Whose E-mail address is that? A It's the general E-mail from MF Corporate Service Nevada. My secretary can see it and I can see it, and difference of the other one what is my personal E-mail. Q Who besides you and your secretary can see E-mail that comes in to Nevada@mfcorpserv.com? A (Through the interpreter) Incoming E-mails or outgoing E-mails? Q Let me ask the question again. Who besides you and your secretary has access E-mail that goes to Nevada@mfcorpserv.com? A Me and her. Q Nobody else? A Nobody else? A Nobody else. Q Is there anyone besides you and then this Nevada@mfcorpserv.com that has an E-mail address with t mfcorpserv.com domain name? A No. Q Those are the only two E-mail addresses in the world A I have another E-mail address with the mfcorpserv.com, but it's us two.	2000000	25	24	23	22	21	20	19	18	17	16	15	14	13	12	P P	10	9		7	6	ΟΊ	4	ω
		but it's us	I have another E-mail address with		Those are the only two E-mail addresses in			that has an E-mail address with	Is there anyone besides you and then	Nobody	Nobody	Me and	that goes to	besides you and your secretary has access	Let me ask the question		(Through the interpreter) Incoming E-mails	that comes in to	Who besides you and your secretary can	E-mail.	t, and difference of the other one what is my	Nevada. My secretary can see it and I can	It's the general E-mail	E-mail address is

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25 A Yes.		A Yes, it is.	25
24 instructions to set up a Wyoming corporat	in Wyoming?	Q Is that managed is that office :	24
23 Q Well, when you get do you even	(**************************************	manager. I also manage that office too.	23
22 BY MR. HRANITZKY:	as the	(Through the interpreter) I work a	22
21 Wyoming.		A Yeah, a manager.	21
20 company in Nevada, I also say why not offe		Q Okay. But you said you're the manager?	20
19 the effort to sell it, it's my own. If so	- THE REST OF THE	any position.	19
18 marketing product that I thought it would	I don't have	maybe I'm the manager. I don't know. No,	18
17 THE WITNESS: (Through the interpreter	so. Maybe,	A I don't remember. I don't think so	17
16 THE REPORTER: I'm sorry. I'm not und	entity?	Q Do you have a position with that en	16
15 I try	. The state of the	different entity.	15
14 A Well, Wyoming is another product.	It's	A No, because it's different company.	14
13 job with the Wyoming entity?	all the second	Q So you're the secretary of the	13
12 directions or instructions on behalf of ci	S.C. O'Class and Services	the head office of the Wyoming office.	12
11 Q Okay. And when you receive do	office. I'm	A Yeah, the same. I'm running the o	11
10 A My overall.	Wyoming office?	Q Do you have a position with the Wyo	10
9 Q That's part of your overall job?	र्गान्यकार स्वाप्तिक स्वी	A Two or three year.	9
8 A Not at all, no.	en around?	${\mathbb Q}$ How long has the Wyoming office been	∞
7 that job?		A Uh-huh.	7
6 Q Do you have a separate employment		Q Wyoming@mfcorpserv.com?	0
5 than once a month.		Wyoming@mfcorpserv.com.	σ
4 A Depend on how I need it. Once a		We have an office in Wyoming called	4
3 Q How often?	ce in Wyoming.	A No. It's another one from my office	ω
2 A Uh-huh.	300000000000000000000000000000000000000	Nevada@mfcorpserv.com and that's it?	2
1 Q So do you go to Wyoming for that	and	Q So it's Pamunategui@mfcorpserv.com and	ъ
Page 90	Page 89		

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23	20 21 22	18	15 16	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	11098	7 6 5	- C & 4	Page
Q Wel	company Wyoming. BY MR. H	0 3	I try THE	directions job with t	0 A 0 A	than once Q that job?	а о а с	90
Well, when you get do you ever get ions to set up a Wyoming corporation?	in Nevada, I also say why not offer them one in	product that I thought it would be usef t to sell it, it's my own. If someone a	rstandin It is	or instructions on behalf of clients he Wyoming entity?	Not at all, no. That's part of your overall job? My overall. Okav. And when you receive do you receive	e a month. Do you have a separate employment contract for)?	On-huh. How often? Depend on how I need it. Once a month or less	

Eage 91 1 Q Who do those come from? 2 A Samo, Itis Vergara. 3 Q That's all I was asking. 4 A Same production or marketing. 5 Q Do you see at the bottom of Exhibit 3 it says. 6 "Patricia Amunategui, head of Nerada office"? 7 A Uh-huh. 8 Q So I asked you before have you ever heard 9 WE Nerada referred to as the Newada office and you said 10 mo. 11 WHE. WOORS: I need to object. I think that 12 mischaracterizes what you said before. You asked whether 13 if had been referred to as the head of the Newada office 14 of Mossack Proseca, which is not the same question that 15 you just asked. 16 From Year or The Newada of the Says are more people who receive these E-mail 17 I closes to bring all my signature "head of the Says are more people who receive these E-mail 18 Office Newada" or "head of the Says quedecided to do that so that 20 client thinks I'm the only person in the back. You look 21 Dotton if you put head of the office. 22 BY MR. HEANTEKY: 23 O Sol i was your decision to put "head of Newada 24 Office" 25 A Vea. 26 A Vea. 27 I whow there are more people under me, the conty one work, so I was you decided to do that so that so that so that so the newada of the original person working? 3 I that been referred to as the head of the Newada office 10 I have more people who receive these E-mail 11 Universal conting? 12 obvious to people who receive these E-mail 13 It had been referred to as the head of the Newada office 14 A Tant to know there are more people under me, the conty one work, so I was you decided to do that so that so that so the new people under me, the conty one work, so I was you decided to do that so that so that so the new people under me, the conty one work, so I was you decided to do that so that so the new people under me, the conty one work, so I was you decided to do that so the lead of the original people who receive these E-mail 10 I have more people who receive these E-mail 11 D So you decided to do that so the head of the original people who receive these	www.oasisreporting.com OASIS REPORTING SERVICES, LLC	www pasistenorting com OASIS REPORTING SERVICES LLC 702-476-4500	
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Q Who do those come from? Page 91 Page 92 1 Q under	А	A Same, Iris	
91 Page	Q under	Q Who do those come	

No I try to read it in that time This is the	D II
Q This is a have you seen Exhibit 4 before?	24
A Okay.	23
Q Okay. Could you look now at Exhibit 4.	22
a good idea.	21
person had proposed that to me and $\boldsymbol{\mathrm{I}}$ thought it would be	20
A (Through the interpreter) I think the I.T.	19
Q I see.	18
marketing thing.	17
A I think look more professional. It's a	16
Q I see.	15
A Yeah, yeah.	14
the only person working?	13
obvious to people who receive these E-mails that you're	12
Q So you decided to do that so that it's not	11
I have more people, look more professional.	10
mean my I'm the only one work, so I want to look like	9
I want to know this is the head of this the people, I	∞
I know there are more people under me, the president, but	7
That's what he say. I call head of the office because -	Q
A Yeah, but I don't mean to repeat on that.	5
the Nevada office?	4
Q Okay. So you have seen MF Nevada referred to as	ω
A Yeah.	2
Q under your signature on E-mails?	\vdash
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reference to Mossfon Asset Management SA?	Corporation? 25	Mossfon Trust	25	
Q What about in the next paragraph, do you see the	fifth paragraph there's a reference to	two, three	24	
A As far as I know, yes.	Then reading down, you see in the one,	Q Okay.	23	
Q As far as you know?	this. 22	something like	22	
with this department.	don't have access to do it, but I think 21	how is. I don	21	
A Well, maybe, but I don't know. I don't deal	e, yeah, something like this. I never know 20	A Online,	20	
possible that you may have been there and not know it?	y could pay invoices online?	Q So they	19	
Q Well, if you don't know what they do, it's	18	them to pay.	18	
BY MR. HRANITZKY:	they buy in a portable thing so it's easy for	their they l	17	
idea what it is.	client can pay invoices for whatever	A The c	16	
know. I don't know even what they do. I don't have no	so what do you think?	Q Well,	15	
THE WITNESS: No, no. I know exist, but I don't	14	something.	14	
MR. WOODS: Was that a "no"?	ning. I'm not familiar, but I think	A Something.	13	
A No.	Do you know what that's talking about?	Q Do yo	12	
Q Have you ever been to Mossfon Trust Corporation?	11	A Uh-huh.	브	
A No.	ion portal?	client information	10	
Q at Mossfon Trust Corporation?	ence to a virtual client portal and the	there's a reference	9	
A No.	see in the second paragraph you see 8	Q Do you	ω	
Q Have you ever interacted with anyone	ever. 7	A No, never	7	
service, but I don't know.	·e? 6	Exhibit 4 before?	о	
A I think it's another company. They do different	So back to Exhibit 4, you've never seen 5	Q Okay.	ъ	
Q What is Mossfon Trust Corporation?	I provide that.	A Yeah.	4	
A I heard the name, yes.	e I showed it to you?	Exhibit 3 before	ω	
Q Have you heard of Mossfon Trust Corporation?	By the way, I forgot to ask, had you seen 2	Q Okay.	Ν	
A Okay.	have this document in my hand.	first time I h	ъ	
e 94.	Page 93 Page			
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Page 95 A Well, I believe it's another department and I don't know either. The same. Q You believe that's another department? A Sorry, another company. Q Another company? A Wh-huh. Q Another company? A Who, not even close. Q Do you know what Mossfon Asset Management does? A No, not even close. Q Have you ever interacted with anyone from Mossfon Asset Management? A No. Q Have you ever interacted with anyone from Mossfon Asset Management? A No. Q Okay. We can move to Exhibit 6 and, by the way, we're skipping Exhibit 5. A So no more here? Q Yeah, we're done with 4. We're skipping 5? Q Yeah, we don't have a 5 because I'm not going to use my 5. A Okay. Q So you see have you seen the document marked as Exhibit 6 before today? A Uh-huh. Q You have seen this before today? A No. 223	w.oasisreporting.com OASIS REPORTING SERVICES, LLC Rectronically stoned by Ellen Goldstein (001-341-678-7457)	www.oasisreporting.com	www.oa	www.oasisreporting.com OASIS REPORTING SERVICES, LLC 702-476-4500	
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Today is the first time you've seen this?